

Gap Inc. Global Applicant Privacy Policy

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English Français Traditional Chinese Japanese Spanish

Gap, Inc. and its subsidiaries (collectively, 'Gap,' 'we,' 'our,' or 'us') value your trust and are committed to providing transparency and clear choices regarding the personal information we collect and process, including on behalf of our family of brands (Gap®, Old Navy®, Banana Republic®, and Athleta®).

We want to empower you to exercise meaningful control over your personal information. Please read this Gap Inc. Global Applicant Privacy Policy (the Policy) to understand how we process personal information and your privacy rights and choices.

This Policy applies to and describes the personal information we process about applicants and candidates for positions at Gap, including full-time, part-time, temporary, seasonal and internship positions (collectively, '**applicants**').

Gap operates in many different countries and is committed to complying with applicable privacy laws. This Policy is drafted in accordance with applicable privacy laws in the places where we operate. While we strive to manage various privacy laws consistently, some terms, obligations, and rights may only apply or be available in certain jurisdictions. Please see the section, 'Additional Information for Certain Jurisdictions' section below for additional information about our practices and your privacy rights as required by certain privacy laws (as applicable to you).

Use of the term 'right' in this Policy is not intended to and shall not confer any legal rights or remedies on any person or party, and any such rights or remedies shall only exist to the extent expressly provided under applicable law.

What is covered by this Policy? This Policy applies to the personal information that we collect, use, disclose, and process about applicants online (including from our Gap Inc. Careers Site), offline, from third parties such as recruiters and agencies and third-party platforms and tools used in connection with our recruitment and hiring process.

What is out of scope? This Policy does not apply to the personal information we collect about customers or employees. **For customers:** The [Gap, Inc. Privacy Policy](#) (posted in the footer of our websites) describes how we process personal information about customers, shoppers and other third parties with whom we interact in stores or as part of our business. **For employees:** The Gap Inc. Global Employee Privacy Policy (posted on the Thread) applies to the personal information we collect about employees, including existing employees who apply for internal positions with Gap.

What about additional terms and notices? If you apply for a job with Gap, additional terms and notices, such as those set forth in an applicant agreement or employment letter,

may also apply to you and Gap's processing of your personal information. These additional terms may vary depending upon your jurisdiction. We encourage you to read this Policy and any additional terms carefully.

Overview of Privacy Practices - Notice at Collection

This section provides an overview of our information practices, and serves as our 'Notice at Collection' for applicants, pursuant to the California Consumer Privacy Act ('CCPA'). While we encourage you to read our full Applicant Privacy Policy, in this section you will find a summary of our information practices, including the categories of personal information we collect from applicants, as well the purposes for which we collect, use, and disclose such personal information, and whether it is 'sold' or 'shared' (as those terms may be defined by the CCPA or other applicable privacy laws). We do not sell applicant personal information for monetary compensation and will not share it with third parties except as described in this Policy or as otherwise permitted by law.

What categories of applicant personal information do we collect? As further described below, we may collect the following categories of personal information about applicants:

- **Identifiers:** such as name, alias, or user ID, online identifiers (including IP address, device identifiers, and other unique identifiers), contact information (including email address, physical address, and phone number), and other personal identifiers (including account name, Social Security Number, driver's license number, passport number, or other similar government identifiers). We may also collect Identifiers about your references, if you provide this information during the recruitment process.
- **Applicant Records:** records containing personal information, such as name, signature, photo, contact information, education and employment history; Social Security number and other government identifiers; insurance policy number; financial or payment information; date of birth; disability, medical information, or health insurance information; your preferences (e.g., willingness to relocate, current salary, desired salary); any referrals or personal references; and visa, work permits, and other information needed to verify your identity and eligibility to work.
- **Internet and Activity Information:** internet and other electronic network activity information, such as browsing history, search history, information about your interactions with and through our Careers Site and related online services, content you share in our online forums or on third-party platforms, as well as other online activity and usage information.
- **Other Audio, Video, or Electronic Data:** such as audio, electronic, visual, information, such as video recordings, photographs, call recordings, and other audio recordings (e.g., recorded meetings and webinars), and related analytics, as well as records of your communications (online and offline) with us through other communications channels.

- **Characteristics of Protected Classifications:** including, for example, health and disability information (e.g., that we collect to provide accommodations or verify your ability to perform certain duties), demographic and background information such as race, sex, sexual orientation, gender identity, age, national origin, citizenship, disability, citizenship status, military/veteran status, marital status, medical condition or other characteristics of protected classifications under California or federal law. Note: generally, this information is collected on a voluntary basis and is used in support of our equal opportunity and diversity and inclusion efforts and reporting obligations, or where otherwise required by law.
- **Location Data:** including general location data that we may derive from your IP address.
- **Professional or Employment-Related Information:** including your resume and information related to your employment history.
- **Education Information:** including information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
- **Inferences:** including inferences we derive about you based on the above information, including your interests, preferences, and other characteristics or demographic information.
- **Sensitive Personal Information:** in limited circumstances, the personal information we collect includes information that may be classified as sensitive personal information (also known as ‘special categories of personal data’) under applicable privacy laws, such as SSN, driver’s license and other government identifiers (e.g., where necessary for identity verification, fraud detection, and compliance purposes), residency and citizenship (e.g., to verify your right to work), and gender identity, race, ethnicity and other demographic information (e.g., where necessary or collected on a voluntary basis to provide accommodations to you or respond to your requests or inquiries), as well as precise geolocation information (e.g., where you have permitted an online service to access your device location).

For what purposes do we collect and process applicant personal information? In general, we collect, use, disclose, and otherwise process personal information about applicants for the following purposes (which are further described in the ‘Purposes for Processing Applicant Personal Information’ section below):

- Recruiting, hiring, managing, and evaluating applicants
- Managing and improving our Careers Site
- Defending and protecting our rights and those of others
- For security, monitoring, and fraud prevention

- For internal auditing, accounting and corporate governance, to evaluate and plan mergers, acquisitions and similar transactions, and for other internal business purposes such as administration of our records retention program.
- For compliance with legal obligations

What are our retention practices? We retain applicant personal information for the length of time needed to consider your application, fulfil our legal and statutory obligations, protect or defend our rights and the rights of others, and to identify positions in which you may be interested.

What privacy rights and choices do applicants have? You can review and correct your personal information and exercise your applicable privacy rights (including rights to access and delete your information and opt out of sales and sharing for targeted advertising) as described in the section 'Your Privacy Rights and Choices' below.

What legal grounds do we rely on outside of the U.S. to process personal information? EU, UK and similar data protection laws require that we only process personal information where there are valid legal bases to do so. Pursuant to these laws, we may collect, use, disclose and otherwise process personal information about applicants located in these jurisdictions on one or more of the following legal bases:

- To perform our contractual and employment obligations to you, such as to process payroll, leave and benefits (**'performance of contractual obligation'**);
- To support our legitimate business interests, provided your interests and fundamental rights do not override our legitimate business interests, such as conducting performance reviews, financial planning and budget management, securing our Information Resources, developing our business or improving our operations (**'legitimate business interests'**);
- To comply with our legal, regulatory and statutory obligations, including responding to legal and regulatory requests and court orders, validating employment eligibility, and other recordkeeping, accounting, tax, and financial reporting purposes (**'compliance with law'**);
- In limited circumstances, we may also process applicant personal information, where you have provided your explicit consent, such as when processing certain sensitive personal information (**'explicit consent'**);
- Where necessary to protect the vital interests of a data subject (such as to protect the life, health or safety of another person), (**'protecting vital interests'**); and
- To establish, defend and protect our legal rights and interests, or those of third parties (**'protect and defend rights'**).

Collection and Sources of Personal Information

This section provides additional information about the sources and types of personal information we may collect related to applicants, including the personal information we collect through the Careers Site and from other online and offline sources. You can find a summary of the categories of personal information we collect above. Please keep in mind that the actual personal information we collect about you depends on your role and your interactions with us, but typically consists of information you provide to us, information we generate or automatically collect, and information we receive from other sources.

You can navigate our Careers Site without providing us with much personal information, but if you choose to register on the Careers Site, take advantage of the Careers Site's benefits, or otherwise apply for or inquire about a position with us, you must provide us with additional personal information or we will not be able to consider or properly evaluate your application or respond to your inquiry.

The information we collect may vary by job and location and may change from time to time. Prior to submitting your application, you may be asked to review and agree to a localized employee privacy policy or applicant agreement, which further describes how local affiliates will handle your personal information in accordance with applicable laws. Any employment-related decisions will be made by the applicable hiring affiliate(s) in accordance with the laws of the jurisdiction where the job will be located.

Information you provide.

When you apply for or inquire about a position with us, search for positions or create a profile on our Careers Site, or communicate with us about a position, we collect personal information from you, including Identifiers, Applicant Records, Characteristics of Protected Classifications, Professional or Employment-Related Information, Education Information, and Sensitive Personal Information that you disclose or provide to us as part of your application. More specifically, this may include:

- Name, address, telephone number, e-mail address, and other contact information;
- Date of birth;
- Account username and password;
- Social Security Number, National ID number, or Tax ID;
- CV, résumé, cover letter, previous work experience, trainings, and education information;
- Employment preferences, willingness to relocate, current salary, desired salary, and how you heard about the position that you are applying for and the Careers Site;
- Professional and other work-related licenses, permits, visas, and certifications held;
- Languages and other relevant skills, motivations, and experience;

- Demographic information and marital status;
- Racial or ethnic origin;
- Political opinions, religious affiliation, or philosophical beliefs;
- Awards and professional memberships;
- Work authorization status, notice period, planned holidays, and available start date;
- Your information from publicly available sources, including online, that we believe is relevant to your application or a potential future application (e.g., your LinkedIn profile);
- Information related to any assessment you may take as part of the interview screening process;
- Information relating to references;
- Information from third party sites and social media platforms such as LinkedIn;
- Details of your job search, including what roles, departments, and locations interest you;
- Some categories of information that may be considered Sensitive Personal Information (e.g., government identifiers, demographic info, such as race, ethnicity, and marital status) or Characteristics of Protected Classifications (e.g., health and disability information), where required by applicable law or where you voluntarily provide us with such information; and
- Any other information you choose to provide us.

Information we derive or automatically collect.

We may also automatically collect or derive personal information about you, including Internet and Activity Information, Location Data, Other Audio, Video, or Electronic Data, and Inferences. More specifically, this may include:

- Identifiers that can be used to recognize you or a device over time and across different services (like browser ID, device ID, IP address, cookies and app tracking technologies, or other forms of persistent or probabilistic identifiers).
- Internet and Activity Information about your interactions with our Careers Site, including browsing activities and data that reflects the content you have accessed, clicked on, or viewed, use of our accessibility features, and information about the websites or apps visited immediately before or after interacting with our online services.
- Information about your computer or device, such as the browser version and device model, that is derived from your Internet and Activity Information.

- Location Data, which includes your precise location when you permit an online service to access your device location.
- Information generated by certain 'AI' and automated tools on our Careers Site and your communications with these tools (such as chatbots, enhanced search features, and third-party tools), which we use to enhance your experiences or interact with you on our Careers Site.
- Inferences based on the personal information we collect about you from multiple sources.
- In accordance with applicable law, we may also administer assessments and similar evaluations to help us consider applicant qualifications or suitability for certain positions.

Other sources of applicant personal information.

We may also collect personal information about applicants (which may include Identifiers, Applicant Records, Internet and Activity Information, Other Audio, Video, or Electronic Data, Location Data, Professional or Employment-Related Information, Education Information, Inferences, and Sensitive Personal Information) from third party sources, such as:

- Recruiters and recruiting platforms
- Employees that you interview or communicate with related to your application
- Referrals including employee referrals
- References you provide
- Your former employers and educational institutions you have attended
- Publicly available information and databases
- Service providers, representatives and agents (such as recruiting platforms and tools and staffing agencies that transmit applicant information to us)
- Background check and identity verification services
- Affiliates and subsidiaries

Aggregate and non-identifiable data.

We may generate and use data related to applicants, our Careers Site, and our recruiting activities and related business operations that is not personal information. This includes, for example, aggregate or anonymous data that does not identify and is not reasonably linkable to a particular person. In addition, we may generate and maintain de-identified data, which is no longer linked or reasonably linked to a particular person or household and cannot reasonably be used to identify you. Where we generate and rely on de-

identified data, we will maintain and use this data only in a de-identified form and will not attempt to re-identify such data, except as permitted by applicable law.

Purposes for Processing Applicant Personal Information

We collect, use, disclose, and otherwise process the personal information we collect about applicants as described in this section. *(If you are in the United Kingdom or the European Union/European Economic Area ('UK/EEA'), we have also identified the corresponding legal bases for our processing under UK/EU and similar data protection laws.)*

We may collect, use, disclose and otherwise process applicant personal information for the following purposes:

- **Recruiting, hiring, managing and evaluating applicants:** To review, assess, recruit, consider applications and otherwise manage the recruiting process, including to:
 - Schedule and conduct interviews, evaluations and other assessments;
 - Identify potential candidates, including by working with external recruiters;
 - Review, assess and verify information provided, to conduct criminal and background checks (where relevant and pursuant to applicable law), and to otherwise screen or evaluate an applicant's qualifications, suitability and other relevant characteristics;
 - To verify your identity and eligibility to work;
 - Extend offers, negotiate the terms of offers and assess salary and compensation matters
 - Communicate with applicants regarding their applications and provide updates on the recruitment process and other information you requested.
 - Provide information about Gap and other position(s) for which applicants may be interested;
 - Support our equal opportunity employment policy and practices; and
 - If you are hired, some of your personal information will also be used for purposes of onboarding, enrolling you in our HRIS platform, and establishing your employee relationship, subject to our employee privacy notice.

(UK/EEA legal bases: performance of contractual obligation(s); legitimate business interests; and compliance with law.)

- **Managing and improving our Careers Site:** To enable you to create a profile on and search for and apply for positions using our Careers Site and to improve our Careers Site and related services and features, including to:

- Allow you to register on the Careers Site and use the Careers Site’s features;
- Allow you to search and apply for jobs;
- Manage your account and update your profile and personal information; and
- Manage, evaluate, and improve Gap’s recruiting and onboarding tools and processes;
- Tailor and improve our Careers Site and experiences to better suit your needs and the needs of our community; and
- Make recommendations about open positions in which an applicant may be interested, based on past searches and applications.

(UK/EEA legal bases: performance of contractual obligation(s); and legitimate business interests.)

- **Security and monitoring:** To monitor and secure our resources, network, premises and assets, including to:
 - Monitor for, prevent, investigate and respond to security and privacy incidents, or suspected fraud or illegal conduct;
 - Provide and manage access to our Careers Site and other online resources;
 - Monitor and ensure the security and functioning of our systems and assets and identify bugs and errors; and
 - Secure our offices, premises and physical assets, including through the use of electronic access systems and video monitoring.

(UK/EEA legal bases: performance of contractual obligation(s); protecting vital interests; protect and defend rights; and legitimate business interests.)

- **Defending and protecting rights:** To protect and defend our rights and interests and those of third parties, including to:
 - Manage and respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
 - To enforce our terms and conditions and this Policy;
 - To protect the privacy, safety, or property, of us and others; and
 - To permit us to pursue available remedies or limit damages that we may sustain.

(UK/EEA legal bases: protect and defend rights; and legitimate business interests.)

- **Complying with legal obligations:** To comply with applicable legal obligations and with audit and reporting requirements relating to such legal obligations (such as under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations and other applicable laws, regulations, opinions and guidance), including to:
 - To comply with or monitor compliance with any applicable laws or regulations, including laws outside your country of residence;
 - To respond to requests from public and government authorities, including authorities outside of your country of residence, and comply with subpoenas, court orders and other legal process;
 - To cooperate with law enforcement (for example, when we receive law enforcement requests and orders);
 - To protect against fraud or other illegal activities or for risk management purposes; and
 - In connection with a sale or business transaction (for example, we may have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any 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 bankruptcy or similar proceedings)).

(UK/EEA legal bases: protect and defend rights; legitimate business interests; and compliance with law.)

- **Auditing, accounting and corporate governance:** In support of financial, tax, accounting and reporting obligations, to conduct audits and assessments of our business operations, security controls, financial controls or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program. In addition, for purposes of planning, due diligence and implementation of commercial transactions (e.g., mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions).

(UK/EEA legal bases: our legitimate business interests; and compliance with law.)

- **Sensitive personal information.** Notwithstanding any of the purposes or disclosures described above, we do not use or disclose applicants' sensitive personal information beyond the purposes authorized by applicable law (such as the California Consumer Privacy Act). Accordingly, we only use and disclose such sensitive personal information as reasonably necessary and proportionate: (i) to maintain and manage applicant and business relationships and provide products or perform services requested by applicants; (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents; (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct; (iv) to

verify or maintain the quality and safety of our services; (v) for compliance with our legal obligations; (vi) to our service providers who perform services on our behalf; and (vii) for purposes other than inferring characteristics about you.

(UK/EEA legal bases: explicit consent.)

Disclosure of Personal Information and Recipients

We may disclose the personal information we collect for the purposes described above, including to:

- Gap group entities that are involved in evaluating candidates for a given position. As such, your personal information may be processed by Gap employees or agents who have a business need to access such personal information, including human resources personnel, technical services personnel, personnel in the department responsible for the position for which you are applying, and managers or their designees. Gap will remain responsible for personal information that is jointly used with affiliates. You can consult the list and location of our affiliates [here](#).
- Our vendors, service providers, contractors, affiliates, external auditors, agents, and other representatives that are acting on our behalf or providing services to us. They may also use the information they process on our behalf to improve the products and services they provide to us, including to train AI models and ML algorithms; provided, however, that vendors may not use applicants' sensitive personal information for such training purposes;
- Accountants, auditors, lawyers, insurers, bankers and other outside professional advisors in all of the countries in which we operate.
- Entities that regulate or have jurisdiction over Gap such as regulatory authorities, law enforcement, public bodies and judicial bodies.
- Internet service providers (ISPs), operating systems, platforms, and providers of technology that we use to operate our business, administer and secure our Information Resources, and facilitate applicant communications.
- Consulting firms, analytics providers, and other business advisors that help us evaluate, improve and develop our operations, services and business practices, improve operating costs and expenses, evaluate, plan and implement mergers and acquisitions, sales and other organizational changes and restructuring, or meet our risk, compliance and regulatory obligations.
- A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Gap business, assets or stock (including in connection with any bankruptcy or similar proceedings).

- If you inquire or apply for a position with Gap through a recruiter, certain information about you will be shared with Gap via such recruiters, who are responsible for their respective privacy practices.
- We may use analytics, AI features, and other automated tools on the Careers Site and as part of our recruiting and applicant processes. Some of these tools are provided by third parties, who will collect or receive personal information to provide these features to you or their services to us.
- Some content on our Careers Site is intended for you and other Gap applicants to share various details, such as photos and videos related to volunteer activities. This content may be publicly available. For further details about these forums, please see the 'Forums, Blogs, and Social Media' section.

In addition, we may disclose or make available your personal information to others under the following circumstances:

- As requested, directed or authorized by you;
- To support our internal operations and compliance functions;
- Where we believe necessary or appropriate to protect, enforce, or defend our legal rights and the rights of others, including related to anticipated or actual legal claims or proceedings in which we are involved, and to protect individuals' privacy, security, and safety;
- To help us prevent, detect, and investigate security incidents and combat fraud or other illegal activities; and
- To comply with or enforce the law, legal process, or applicable legal requirements, respond to court orders, warrants, subpoenas, and other requests from public and government authorities.
- For advertising and marketing purposes. For more information about how we may share information for targeted advertising and how you can opt out, please see the 'Your Privacy Rights and Choices' section of this Policy.

Your Privacy Rights and Choices

Depending on where you reside and legal limitations, applicable laws in your jurisdiction may grant you the right to make certain privacy requests. Applicants that do not live in one of these jurisdictions, may still make the same privacy requests, and we will take reasonable steps to fulfill them.

Privacy rights requests. Subject to certain limitations and exemptions, applicants may make a request to:

- **Access (or to 'know')**: You may request a copy of the personal information we have collected about you.
- **Delete**: You may request that we delete the personal information we have collected about you under certain circumstances.
- **Correct**: You may request to have inaccurate information about you corrected.
- **Opt-out/object**: You may opt out of or object to certain types of processing of your personal information, including 'sales' of personal information to third parties and 'sharing' and processing personal information to serve 'targeted advertising.'

How to make a request to access, delete, or correct:

If you have registered with Gap's Careers Site, you may log in to your candidate profile to access, delete, and correct personal information stored on the Careers Site. The updated profile will be used as the default the next time you apply for a job using your account online. To update personal information that you submitted as part of an application for a specific position, please edit your application for that position. We encourage you to promptly update your personal information if it changes or is inaccurate. Upon your request, we will also deactivate or remove your personal information from our active databases, although some information may be retained as permitted or required by applicable laws.

Exceptions and other reasons we may deny a request to access, delete, or correct:

We will respond to your request consistent with applicable law. Please note, however, that certain personal information may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

We will take steps to verify your request by matching the information provided by you with the information we have in our records. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient details that allows us to properly understand, evaluate, and respond to it.

In some cases, we may request additional information in order to verify your request or where necessary to process your request. We work to fulfill requests within the time frames provided by applicable law. Generally, requests to access, delete, and correct may take up to 30 or 45 days to complete, depending on where you reside. In some cases, we may need additional time. We may not be able to honor certain requests to the extent they restrict our ability to comply with applicable law (including cooperation with law enforcement) or our regulatory requirements, we believe information is necessary to exercise or defend an existing or anticipated legal claim, and where the information is necessary to protect our rights, operations, and property, or the rights, privacy, safety, and property of others. If we are unable to honor a request, we will explain why.

For other requests, please contact us at privacy@gap.com or write to us at the address in the 'Contact Us' section below.

How to opt-out of 'sales' and 'sharing' for targeted advertising:

We use and share your personal information with others to provide certain online features and functionalities or analytics services to us. Information may be shared online via cookies, pixel tags, and similar technologies connected to your browser or device ('Online Info'). We may also share information about you and your interactions with us (both online and offline) along with your email address or other unique identifiers ('Offline Info'). The activities may be deemed a 'sale' or 'sharing' for 'targeted advertising' under applicable privacy laws. You can opt out of sales and sharing as explained below. Even if you opt-out, you may still see our ads, but they won't be personalized for you.

You can opt-out of both Online Info and Offline Info sharing from 'Your privacy choices ' in the footer of this website. Online Info opt-outs apply directly from the Privacy Preference Page; Offline Info opt-outs are completed through a webform linked from that page. Details on each option below.

Online Info. You can opt out of Online Info sharing. These opt outs are browser and device-specific. So, unless otherwise noted, you need to opt out for each browser and device you use.

- **Privacy Preference Page.** Opt out of Online Info sharing on our Privacy Preference Page. To access this page, click 'Your Privacy Choices ' in the footer of this site. If you delete your browser's cookies after opting out, you will need to re-apply your opt out for that browser.
- **Browser Signals.** Turn on Global Privacy Control (GPC) signals for your browser. If we recognize that your browser is transmitting global privacy control (GPC) signals ([more info](#)) when you visit our site, we will opt your browser out of sales and sharing on this site. Once set, you'll see 'Browser Opt-Out Honored' displayed when you access our Privacy Preference Page. You will need to set GPC for each browser and device used to access our site. (Note: Our site does not recognize browser 'Do-Not-Track' signals.)

More info about online opt outs:

- Opting out does not turn off all cookies, pixels, and similar technologies on our sites. We will still use cookies that are necessary for our site to function properly or enable core functionality such as security, network management, and accessibility. If you disable these by changing your browser settings, this may affect how the site functions.
- You may also be able to use industry ad choice tools to control how certain third-party advertisers use the information that they collect about you on our online

services and third-party sites and apps. If you are in the U.S., you can obtain more information at aboutads.info/choices (Digital Advertising Alliance). You may also download the DAA AppChoices (<https://youradchoices.com/appchoices>) tool in order to help control interest-based advertising on apps on your mobile device.

Offline Info. You can also opt out of sales and sharing of Offline Info by completing our [Privacy Preference Webform](#) (accessible by clicking the link), by visiting 'Your Privacy Choices ' or by emailing us at myprivacyrights@gap.com with the required information for the webform. Authorized agents may also submit requests to opt-out of the 'sale' or 'sharing' on behalf of applicants (for whom they are authorized to act) using our Privacy Preference Webform. We only use the information collected from opt-out requests to fulfill and maintain records of such requests. These requests may take up to 15 business days to process.

You can read more about how websites collect and use your information and take additional steps to control targeted advertising from many ad networks and exchanges by visiting The Federal Trade Commission website. As online environments continue to evolve, additional opt-out mechanisms or privacy settings may become available to you. We encourage you to review the information on opt-outs and settings that browser owners, device manufacturers, technology companies, and industry associations make available to you.

Please note that this Gapinc.com site (www.gapinc.com) runs independently from our other sites. The steps above will only apply to information related to your access and use of this site and Gapinc.com interactions.

Other opt-outs and privacy choices:

If you would like to receive or unsubscribe from receiving notifications about Gap recruitment activities, including notifications about jobs which may interest you, please go to the Careers site and/or related website subsidiaries, from the Careers Site homepage, log into your candidate profile, entering the credentials used when setting up your user account. To subscribe/unsubscribe from job notifications, access "My Account Options." The job notifications are located in the correspondence section. After checking or unchecking the box, click save.

Children's Privacy

Our Careers Site is not targeted to or intended for use by children, nor do we knowingly collect information directly from children. If you believe that we have collected personal information about your minor through our Careers Site, please contact privacy@gap.com.

Please note that we do not sell or share any personal information about minors we know are under 16, nor do we sell or share any Sensitive Personal Information we collect from applicants.

Security and Retention

We have implemented measures designed to protect your personal information. However, no safeguards are 100% effective. You should take steps to protect yourself and your account information as well (e.g., by using a strong password that is unique for each account and regularly changing your passwords). If you receive a suspicious email that appears to be from us, please contact us as identified in the '[Contact us](#)' section of this Policy.

We retain applicant personal information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law. In general, the criteria used to determine our retention periods are as follows: (i) the duration of the application process or considering whether your skills are suitable for other opportunities; (ii) as long as we have an ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; and (iv) as advisable in light of our legal considerations such as applicable statutes of limitations, litigation, or regulatory investigations.

Note that Gap may delete personal information about you (including your CV or résumé) from our database at any time and without any reason. Therefore, please retain your own copy of the personal information provided to us.

Data Transfers

Our Careers Site, which is available to applicants in multiple jurisdictions, is operated by The Gap Inc. from the United States. However, any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where that Gap group entity is located. If we share your personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Policy.

Any personal information you submit to the Careers Site will be stored and processed in, and subject to the laws of, the United States and other jurisdictions where Gap group entities or our service providers and vendors have operations. If you are located in the United Kingdom or the EEA, you should know that the United States and these other jurisdictions may not have equivalent data protection laws as those in the UK and EEA. In such cases European Union/European Economic Area, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to provide appropriate safeguards for the transfer of your information. You may obtain more information about these safeguards by contacting us at privacy@gap.com or writing to us at the address in the 'Contact Us' section below.

Third-party Sites and Platforms

We may provide links to third-party websites for your convenience and information. If you access those links, you will leave Gap's websites. This Policy does not address, and we are not responsible for, the privacy, information, or other practices of these third parties. The inclusion of links to third-party websites does not imply endorsement of the linked sites or the applicable third parties' services by Gap or our affiliates. We encourage you to review the privacy notices and practices of any company before submitting your personal information. Some third-party companies may share personal information with Gap, that sharing is governed by that third-party company's privacy statement.

Diversity

Gap is an equal opportunity employer, which means we offer equal treatment to all applicants. Gap does not discriminate, either directly or indirectly, on the grounds of sex, sexual orientation, gender identity, race, ethnic origin, religion, belief, disability, marital status, creed, nationality, national origin, color, and/or age in any area of recruitment. Where permitted by applicable law, we may ask for information on the ethnic origin, gender, and disability of our applicants for the purpose of monitoring equal opportunity.

Forums, Blogs, and Social Media

Parts of our Careers Site are designed to help you share your job opportunities with your friends, family and contacts who may be interested in those opportunities. You can use our Careers Site to share content and opportunities through a variety of channels, including email and your personal social media accounts. Any information that is shared through these channels may become public information which could be read, collected, or used by other users on a worldwide basis. You should exercise caution when deciding to disclose your personal information with others.

Additionally, our Careers Site may enable you to link your online application to certain social media platforms (such as LinkedIn) to enable you to auto-populate your online application with personal information taken from your social media profile. Please note that you are wholly responsible for the content of any online application you submit via this Careers Site, and it is your responsibility to ensure that any errors arising out of auto-population of online application fields are rectified. Similarly, it is your responsibility to ensure that any fields which are not auto populated by such functionality are correctly completed. As described above in the Section 'Third-party Sites and Platforms', we do not control the terms or privacy policies of third-party websites.

Contact Us

For questions about our Global Applicant Privacy Policy, concerns about our information practices, or to submit a request to exercise your privacy rights under applicable law,

please email us at privacy@gap.com. You may write to us at Gap Inc., Legal Department, 2 Folsom Street, San Francisco, CA 94105.

Additional Contact Information for Certain Jurisdictions.

If you are in one of the following jurisdictions, you may also contact us as set forth below:

- **UK/EEA:** If you are in the European Union or United Kingdom, you may also contact our EU and UK Representative as follows:
 - The DPO Centre Europe Ltd., Alexandra House 3 Ballsbridge Park Dublin, D04C 7H2 Ireland
 - You may email us at EUrep@gap.com
- **Taiwan:** If you are in Taiwan, you may email us at tw_jobs@gap.com.
- **If you are in Japan,** please email us at Japan_Legal_Request@gap.com.

Employees. If you are an employee of Gap or one of Gap's affiliates or subsidiaries, and have questions concerning your personal information, the following resources are available:

- Use the Open Door process and talk to your manager, next level manager, or HR;
- Contact your HR Generalist or HR Support Agent to reach the Employee Services team at the Corporate Shared Services Center (CSSC);
- Use the COBC Hotline; or
- Contact Gap's Privacy Team via email at: privacy@gap.com

Policy Revisions and Updates

We reserve the right to amend this Policy at any time in order to address future developments of Gap, the Careers Site or changes in industry or legal trends. If our information practices change, we will post an updated policy on the website. You can tell if the policy has changed by checking the revision date that appears above. The 'Last Updated' legend at the top of this Policy indicates when this Policy was last revised. Any changes will become effective when we post the revised Policy on the Careers Site.

Additional Information for Certain Jurisdictions

California Residents.

Subject to legal limitations, applicants who are California residents have additional rights regarding their personal information:

- **Deletion:** the right to request deletion of personal information;
- **Know/access:** the right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them;
- **Correction:** the right to request correction of inaccurate personal information we maintain about them;
- **Non-discrimination:** not to be subject to discriminatory treatment for exercising their rights under the CCPA;
- **Opt out of sales and sharing:** the right to opt-out of the sale and sharing of their personal information; and

You may submit a request to exercise your rights under the CCPA, as set forth in the 'Your Privacy Rights and Choices' section above. You may designate an authorized agent to make a request on your behalf. Your agent will be required to provide written proof of their authorization and, in some cases, we may also ask you to directly verify your identity or confirm to us that you provided the agent permission to submit the request on your behalf.

EEA/UK Data Subjects.

If you are a data subject in the EEA or UK, the data controller for your personal data collected through the Careers Site is The Gap, Inc. Where you apply for a position with a Gap group entity in the EEA or UK, your personal data will be transferred to the relevant Gap hiring affiliate, which acts as an independent controller for purposes of evaluating your application and making employment decisions. Any such transfer will be conducted subject to appropriate safeguards. You may exercise your privacy rights regarding your applicant data by submitting a request as set forth in the 'Your Privacy Rights and Choices' section above. The Gap Inc. Data subjects in the EEA and UK also have the following rights under EEA/UK data protection laws:

- **Access:** the right to access (including requesting copies of the personal information we hold about you).
- **Erasure:** the right to erase (including removal of your personal information from our systems, though note this right is not absolute if we have a requirement to continue to hold your personal information).
- **Rectification:** the right to rectify your personal information (if the personal information we hold about you is incomplete or inaccurate).
- **Objection:** the right to object to or to restrict the processing of your personal information (which prevents us from processing your personal information in certain ways, though note this right is not absolute).

- **Portability:** the right to data portability of personal information concerning you that you provided us in a structured, commonly used, and machine-readable format, under certain conditions.
- **Automated Decision-making:** we do not make decisions about you based solely on automated processing of your personal information, including profiling, which produce legal or similarly significant effects, unless necessary for entering or performance of a contract with you based on your explicit consent or as authorized by applicable law.
- **Withdraw consent:** the right to withdraw your consent to processing where processing is based on consent (though note this does not affect the lawfulness of processing before the withdrawal).
- **Appeal:** If we deny your privacy request, to appeal our denial.

You also have the right to lodge a complaint with the relevant data protection authority. If you are based in the EEA, the competent data protection authority's contact details may be found **here**. If you are based in the UK, you may contact ICO **here**. For further information regarding your rights, or to exercise any of your rights, please contact Gap at privacy@gap.com or our EU Representative at EUp@gap.com.

Residents of Japan.

If you are an applicant who resides in Japan, the Gap entity that employs you and The Gap, Inc. will remain jointly responsible for personal information about you that is transferred and jointly used pursuant to this Policy.

'Sensitive Personal Information' means information that is defined under the Personal Information Protection Law as information that requires special consideration in order to prevent unjust discrimination, prejudice, or other disadvantages to the individual, such as an individual's race creed, social status, medical history, criminal history, the fact that the individual has been harmed by a crime, or other information that requires special consideration in order to prevent unjust discrimination, prejudice, or other disadvantages to the individual, and includes but is not limited to results of medical examinations, etc.

Gap will typically not acquire any personal information requiring special consideration without the consent of the individual concerned. As allowed by applicable law, Gap may collect Sensitive Personal Information in the following instances, or where permitted under the Personal Information Protection Law, without your consent:

- When we are required by law or regulation to collect and use such information, such as for legally-required health check-ups or to process tax information.
- When necessary for the protection of life, body or property of an individual and it is difficult to obtain your consent.
- If necessary to improve the public health or promote the sound growth of children and it is difficult to obtain your consent.

- When necessary for cooperating with national state and local government and persons entrusted by them in executing their duties under the law and the process of obtaining your consent may impede the execution of the operations concerned.
- When applicable Sensitive Personal Information has already been disclosed by you, a state organ, a local government, a press organization, an academic institution, or a religious or political organization, etc.
- In cases where Sensitive Personal Information may be clearly self-evident by direct visual observation, for example, by viewing security camera footage in our stores.
- When sharing such information with our service providers.
- In the unlikely event that we transfer data in connection with the take-over of a business in a merger.
- When we jointly use Sensitive Personal Information with third parties.
- In cases where Gap receives Sensitive Personal Information, which is personal data, in the cases listed in each item of Article 27, Paragraph 5 of the Personal Information Protection Law (cases of entrustment, succession of business, and joint use).

Gap may provide Sensitive Personal Information (however, limited to information that has been compiled into a database) to a third party without the consent of the individual in any of the following cases:

- When providing Sensitive Personal Information to contractors who provide services to Gap within the scope necessary to achieve the purposes described in this Notice or legally revised purposes.
- In the event that Gap transfers the Sensitive Personal Information as a result of the succession of business in the unlikely event of a merger or for any other reason.
- When sharing the Sensitive Personal Information with a third party. Where applicable, Gap shall notify the individual in advance or make readily accessible to the individual the items of Sensitive Personal Information that will be jointly used, the scope of joint use, the purpose of use by the party using the information, and the name and address of the person responsible for managing the personal information requiring special consideration, as well as the name of the representative of such party.

An applicant's Individual Number will only be collected, used or disclosed for very limited and legislated purposes, as described in our Individual Number privacy statements. It will not be used as a general identifier and Gap will only ask for it when permitted by law.

Contact Information for Questions or Concerns: Should applicants have any questions or concerns related to the collection, generation, use or disclosure of their Personal Information, they should put their concerns in writing (by Email) to **Japan Legal Request:**

Japan_Legal_Request@gap.com. The Personal Information Protection Commission is able to investigate complaints from applicants in those prefectures regarding the collection, generation, use or disclosure of their Personal Information.

—End of Global Applicant Privacy Policy