

Jimmy Choo Applicant Privacy Notice

Michael Kors Holdings Limited has prepared this Applicant Privacy Notice ("**Notice**") for applicants to employment roles with Jimmy Choo. In connection with your application, we have to process your personal data. The purpose of this Notice is to give you information about how Jimmy Choo collects, processes, stores and otherwise uses information about you, and your rights in relation to that information.

Jimmy Choo needs to process your personal data in order to process your application for employment. There are also statutory requirements we have to comply with in relation to your application. If we are not able to carry out the processing activities we describe in this Notice we may not be able to continue with your application. Of course, we hope it would never come to that, and this is simply information we are obliged to provide to you as part of this Notice.

We need to ask for your specific consent to process your personal data in a particular way in certain circumstances, such as for the purpose of conducting background checks prior to you commencing employment with us, to enable relevant third parties to release information about you as part of those checks. You will be provided with a separate form to complete to confirm that you consent to us processing your data for the purposes of carrying out the background checks listed in that form.

Although we are seeking your consent in relation to certain background checks, you should note that in most cases we will process your personal data for the reasons set out in this Notice and it won't be appropriate or necessary for you to provide consent as the legal basis for processing your personal data.

When we say "Jimmy Choo", "we" or "us" in this document, we mean the Jimmy Choo entity that you're applying to work for (a full list of Jimmy Choo entities is available within the Jimmy Choo Privacy Policy which is located on the Jimmy Choo website). In addition, you will see a number of references to the "Michael Kors Group", which includes all other Michael Kors entities globally (Exhibit A). We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

In this Notice you will see reference to "GDPR" - that refers to the General Data Protection Regulation which is a European law governing your rights in relation to your personal data, and how organisations should protect it.

What categories of personal data does Michael Kors collect about me and why does Jimmy Choo use it?

"Personal data" means any information relating to you. Jimmy Choo will collect, process and use the following categories and types of personal data about you:

- **identification data**, such as your name, citizenship and passport data;
- **contact details**, telephone number and email address;
- **education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience;
- **other application data**, such as compensation details and the information included in your application form/CV;
- **information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies;
- **background check information**, such as information obtained through reference checks and confirmation about your work/educational background.

together "**Applicant Data**".

We collect and use this Applicant Data for a variety of reasons linked to processing your application for a role with us. To help clarify these we have set out below a list of reasons why we collect and use this data (the "**Processing Purposes**") along with examples of some of the Applicant Data used for each of the Processing Purposes:

- **administering and processing your application**, (including processing a job offer should you be successful) including identification data, contact details, information about your qualifications and employment history, and information obtained during your interview and information contained in your CV;
- **to determine your eligibility for the role you applied for**, including identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your CV;
- **conducting background checks as part of your application**, including identification data, contact details, information about your qualification and employment history;
- **complying with applicable laws and employment-related requirements** along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data and contact details;
- **monitoring and ensuring compliance with applicable policies and procedures and laws**, which involves the processing of your identification data and contact details;
- **communicating with you, other Jimmy Choo employees and third parties**, including informing you of future opportunities with Jimmy Choo, which involves the processing of identification data and your contact details;
- **responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of identification data and contact details;
- **complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, information about the role you have applied for, including the role's salary and benefits.

In addition to the collection, processing and use of the Applicant Data, Jimmy Choo collects, processes and uses the following special categories of personal information about you which we describe as "**Sensitive Applicant Data**":

- **health and medical data**, such as information on disability for purposes of accommodating your application and interview and compliance with legal obligations; and
- **race or ethnicity data** such as information contained in your passport or other citizenship and right to work documentation, and information which you have voluntarily provided to Jimmy Choo for the purposes of our equal opportunities and diversity monitoring and initiatives.

Why does Jimmy Choo need to collect, process and use my Applicant Data and Sensitive Applicant Data?

Both the Applicant Data and Sensitive Applicant Data are needed by Jimmy Choo to carry out a variety of activities that are linked to your application for a role with us and Jimmy Choos' compliance with its obligations as part of the recruitment process and as a business.

We are required to explain to you the legal bases for our collecting, processing and use of your Applicant Data and Sensitive Applicant Data.

For Applicant Data, our legal bases are:

- compliance with legal obligations, in particular in the area of labour and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws; the legitimate interests of Jimmy Choo, Jimmy Choo affiliates or other third parties (such as existing

or potential business partners, suppliers, customers, end-customers or governmental bodies or courts); your consent, where that is appropriate, meets the requirements of data protection law and has been separately obtained; protection of vital interests of you or of another individual; performance of a task carried out in the public interest or in the exercise of official authority vested in Jimmy Choo.

For Sensitive Applicant Data, our legal bases are:

- explicit consent as allowed by local data protection law; to carry out the obligations and to exercise the specific rights of Jimmy Choo or you in the field of employment and social security and social protection law as permitted by local data protection law and/or a collective agreement; to protect the vital interests of you or of another individual where you are physically or legally incapable of giving consent; public data as made public manifestly by you; to establish, exercise or defend a legal claims or whenever courts are acting in their judicial capacity; for substantial public interest as permitted by local data protection law; for assessment of the working capacity of the employee as permitted by local data protection law.

Where we talk about legitimate interests of Jimmy Choo or third parties, this can include:

- Assessing your suitability for employment/engagement with Jimmy Choo;
- Implementation and operation of a group-wide organisational structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media and the arts;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Physical security, IT and network security;
- Internal Investigations; and
- Proposed mergers and acquisitions.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

Who might Jimmy Choo share my personal information with?

As you may know, we are part of the global Michael Kors Group, and several entities in this group are involved in the Processing Purposes. To ensure that the Processing Purposes can be completed, your information may be shared with any of the entities within the Michael Kors network. Where we do share data in this way, however, it is our policy to limit the categories of individual who have access to that personal information.

Jimmy Choo may transfer personal data to third parties, including to entities within and outside the Michael Kors Group located in any jurisdictions where Michael Kors Group entities are located, for the Processing Purposes as follows:

- **Within the Michael Kors Group.** As the Michael Kors entity that you're applying to work for is part of a wider group with headquarters in the USA, and offices located across the globe, which all partially share management, human resources, legal, compliance, finance and audit responsibility, Jimmy Choo may transfer the Applicant Data and Sensitive Applicant Data to, or otherwise allow access to such data by other entities within the Michael Kors Group and the Directors of the Michael Kors Group, which may use, transfer, and process the data for the following purposes: to communicate information about the Michael Kors Group; to monitor and assure compliance with applicable policies

and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities, including authorities in the United States.

- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Michael Kors Group entities and third parties that we may share your data with, please contact us as set out below to request the Record of Processing.

As you may have noticed, some of the recipients we may share Applicant Data and Sensitive Applicant Data with may be located in countries outside of Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("EEA").

Some countries where recipients are located already provide an adequate level of protection for this data (such as Switzerland), and transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. Nonetheless, for transfers to Jimmy Choo entities outside of the EEA, Jimmy Choo will be bound by the EU Standard Data Protection Clauses (pursuant to Article 46(2)(c) GDPR), which the European Commission has assessed as providing an adequate level of protection for personal data, to ensure that your data is protected adequately.

If recipients are located in other countries without adequate protections for personal data, Jimmy Choo will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses. You can ask for a copy of such appropriate safeguards by contacting us as set out below ("Who can I contact?").

How long will Jimmy Choo keep my personal information for?

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep your personal information for a reasonable time after your application process is completed, in case we have future job opportunities that we consider you are suitable for. Where personal information is kept, that period will be determined based on the applicable local law. For further information, please contact us as set out below.

What rights do I have in respect of my personal information?

You have a number of rights in relation to your Applicant Data and Sensitive Applicant Data. These can differ by country, but can be summarised in broad terms as follows:

(i) Right of access

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

(ii) Right to rectification

You may have the right to rectify inaccurate or incomplete personal data concerning you.

(iii) Right to erasure (right to be forgotten)

You may have the right to ask us to erase personal data concerning you.

(iv) Right to restriction of processing

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Applicant Data and Sensitive Applicant Data for the Processing Purposes we think that we have a legitimate interest in processing that data which may override a request that you make.

(v) Right to data portability

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

(vi) Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

To exercise any of these rights, please contact us as stated under below **(Who can I contact about these matters?)**

You also have the right to lodge a complaint with the competent data protection supervisory authority.

Who can I contact about this matter?

If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, you can get hold of the right person here:

Email: privacy@jimmychoo.com

Address: Data Protection Team, 10 Howick Place, London, UK. SW1P 1GW

Exhibit A

Entity	Address	Co. Registration Number
Michael Kors (Switzerland) GmbH	Via Cantonale, 18, Manno, Switzerland, CH 6928	CHE-115.453.339
Michael Kors (France) SAS	26 rue Laffitte, 75009, Paris, France	523 106 722 R.C.S.
Michael Kors (Austria) GmbH	Designer Outlet Straße 1, Pavillion 406 7111 Parndorf, Austria	FN 358640 m
Michael Kors (UK) Limited	33 Kingsway, London WC2E8 6UF	06481234
Michael Kors Belgium BVBA	Zetellaan 100B, 3630 Maasmechelen, Belgium	0840.690.882
Michael Kors (Switzerland) Retail GmbH	Via Cantonale, 18, Manno, Switzerland, CH 6928	CHE-367.214.352
Michael Kors (Czech Republic) s.r.o.	Klimentská 1216/46, Nové Město, 110 00 Praha 1	291 44 060
Michael Kors (Denmark) ApS	Bech-Bruun, Langelinie Allé 35, 2100, Copenhagen	35418008
Michael Kors (Germany) GmbH	Theatinerstrasse 12, 80333 Munich, Germany	HRB 184713
Michael Kors Spain SLU	calle Alfonso XII #38, 1º izquierda, 28014, Madrid, Spain	NIF: B65157562
Michael Kors (Hungary) Kft	Rákóczi út 42, 1072 Budapest, Hungary	Cg.01-09-174241
Michael Kors Italy S.R.L. con socio unico	Sede in Corso Venezia 46, 20121 Milan, Italy	06697460969
Michael Kors (Ireland) Limited	Unit 8, Level 1 Dundrum Town Center Sandyford Road Dublin 16, Ireland	524310
Michael Kors (Netherlands) B.V.	John Hicksstraat 1, 5928SJ Venlo, The Netherlands	851032448
Michael Kors (Europe) B.V.	John Hicksstraat 1, 5928SJ Venlo, The Netherlands	819371464
Michael Kors (Norway) AS	Bygdøy allé 2, 0257 Oslo, Norway	913 334 744
Michael Kors (Poland) sp. z.o.o.	ul. Woloska nr 12, 02-675 Warsaw, Poland	0000397075
Michael Kors (Portugal) Lda.	Av. Infante D. Henrique, 26 1149-096 Lisbon, Portugal	510443850
Michael Kors (Sweden) AB	c/o Baker & McKenzie advokatbyrå KB, Box 180, 101 23 Stockholm, Sweden	556928-9753
Michael Kors (Finland) Oy	c/o Galleria Esplanad Mikonkatu 3, G9, 00100 Helsinki, Finland	2650227-9
Michael Kors (Latvia) SIA	Lielirbes iela 29, LV-1046 Riga, Latvia	40103861138
Michael Kors (Bucharest Store) SRL	Calea 13 Septembrie no.90, Ground Floor, Space no DE89, 5th District, Bucharest, 050726 Romania	506623
UAB Michael Kors (Lithuania)	Jogailos g. 9, LT-01116 Vilnius, Lithuania	303704393
Michael Kors (Luxembourg) Retail S.à r.l.	21, rue de Louvigny, L-1946 Luxembourg	B 191590