

CAREERS PRIVACY POLICY

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Last Updated: January 1, 2024

Welcome to Nordstrom Careers. Nordstrom, Inc., including its affiliates and subsidiaries, wherever located, (collectively, "**Nordstrom**", "**we**" or "**us**"), take the privacy and security of your personal information seriously. This Careers Privacy Policy ("**Policy**") applies to our collection and use of your personal information as both a job applicant ("**Applicant**") and a permanent or temporary employee or non-agency independent contractor ("**Worker**") no matter where you work. In some cases, additional rights may be granted to individuals in accordance with applicable local law and we will note where that applies within this Policy. While the legal definition of personal information may be different depending on where an individual resides or works, in general, personal information means information about an identified or reasonably identifiable individual and may or may not include business related information such as contact information or job title or role. In the event of a conflict between this Policy and applicable law, applicable law will prevail to the extent of any such inconsistency. Throughout this Policy we will refer to the personal information we obtain in the application, independent contractor engagement or employment context as "**Employment Data**".

Where we refer to employment, engagement, or work, in this Policy, we do so for convenience only, and this should in no way be interpreted as implying employment status on non-employees to whom this Policy also applies. This Policy does not form part of any contract of employment or engagement, does not confer any employment status or contractual right on any Worker, and does not place any contractual obligation on us.

CATEGORIES OF EMPLOYMENT DATA WE COLLECT

The categories of personal information we collect vary depending on whether you are an Applicant or Worker. Additionally, Employment Data may be collected directly from you or from a third party. Below are examples of the categories of Employment Data we may receive but note that these are not complete lists, should be used as a guide, and that the categories of Employment Data Nordstrom receives may change based upon business needs and goals.

Applicant Information

- **Identifiers**, including your name, alias, postal and email addresses, unique personal identifier, online identifier, internet protocol address, and phone numbers, including your Social Security or Social Insurance Number, driver's license and passport information, and identifiers and login credentials associated with our Careers website.
- **Characteristics of protected classifications under applicable state or federal law**, including age, race or ethnic origin, sex, marital status, sexual orientation, and information about medical conditions or disabilities.
- **Professional or employment information** including job application information, such as your resume, cover letter, job application, background check, previous work history, employment verification, and other job-related skills and interests, including positions you are interested in or information and materials you submitted or authorized us to obtain in connection with applying and information you share while interviewing for employment at Nordstrom.
- **Demographic information**, including your date of birth and age, gender/gender identity, race and ethnicity, information regarding eligibility and, and other similar information about you.
- **Audio, electronic, visual or similar information including** video and photographic information of you, including if you participate in video interviews with us and audio information, including call recordings when you call us for support with your application or the hiring process.
- **Internet or other electronic network activity information**, including device and browsing information, including information about your phone, tablet, computer, or device, and online browsing activity in connection with the application process. This information may include IP addresses, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information. It also may include information about when and how you access and use our applicant websites, such as the date and time of your visit or use, the websites you visit before coming and after leaving our websites, how you navigate and what actions you take on our applicant website, and the jobs you view or apply for.
- **Inferences** about you that may help us better understand your preferences, skills, abilities, or aptitudes.
- **Other personal information** required under federal, state/provincial or local law that we may request from you or that you choose to provide to us from time to time during the application, interview and hiring process.

Worker Information

- **Identifiers**, including your name, alias, postal and email addresses, unique personal identifier, online identifier, internet protocol address, and phone numbers, including your Social Security or Social Insurance Number, driver's license and passport information, identifiers and login credentials associated with our Careers website, and contact information of your family member(s) and emergency contacts (including name, postal and email addresses and phone numbers), for purposes of calculating tax, salary, pension plan participation, work emergencies and applicable benefits.
- **Characteristics of protected classifications** such as racial or ethnic origin, under applicable state/province or federal law to support government requirements.
- **Benefits information**, such as those benefits plans and programs in which you participate, and benefits claims from you, your beneficiaries, and your dependents, some of which information may be subject to the [Nordstrom Health Plan Notice of Privacy Practices](#).
- **Professional and employment administration information** including job application information, including your resume, cover letter, job application, previous work history and references, educational background, and other testing (where permitted by applicable law), and information and materials you submitted or authorized us to obtain in connection with applying and interviewing for employment at Nordstrom, career history, including the languages you speak and other job-related skills and interests, including positions you are interested in; and may also include absence records, hours worked, paid time off records, financial information such as your salary, tax codes, union membership and banking information, information relating to performance management and promotions such as appraisals or reviews and details related to your presence at a Nordstrom location as may be recorded by electronic card access or pin pad systems.
- **Details associated with use of Nordstrom assets**, such as computers, laptops, mobile devices and telephones. This can include internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding an employee's interaction with an internet website, application, or advertisement.
- **Health Information**, which may include health related information for job related injuries and workers compensation claims, accommodations, retirement or pension plans and for insurance coverage associated with accident, disability or death, and health related information of an employee's family member(s) as may be necessary to process certain employee requests such as a leave of absence.
- **Audio, electronic, visual or similar information including** video and photographic information of you, including if you participate in video interviews with us and audio information, including call recordings when you call us for support when you call for technical, employment, or benefits support, or when you call Nordstrom customers.
- **Location information**, including your approximate physical location when you use your work device, the approximate location of your workspace, and where you stay when you travel for Nordstrom.
- **Internet or other electronic network activity information**, including information about your use of and interaction with company technology, tools, and processes, device and browsing information, whether accessed or used from Nordstrom-provided or personal computers, tablets, smartphones, or other devices. This information may be collected automatically, and may include any data, information, or communications accessed, transmitted, or stored on, those devices, including IP addresses, unique device identifiers, device and browser settings and information, Internet service provider information, websites visited and online services used, e-mail and other communication contents, communication senders and recipients, and other information that indicates how you use company resources, systems, and devices. These practices and the categories of personal information collected are further described in the Nordstrom Expectations document, which can be found on [my.nordstrom.com](#) (access requires authentication).
- **Inferences** about you that help us better understand your preferences, skills, abilities, or aptitudes.
- **Other personal information** we may request from you or that you choose to provide to us from time to time.

SOURCES OF EMPLOYMENT DATA

We may collect Employment Data from a variety of sources including directly from you, automatically from you, or from third parties. The categories of third parties we may receive Employment Data from include:

- Background check and employment screening providers.
- Employment references you provide.
- Social media sites.
- Benefits providers.

PURPOSE OF COLLECTING EMPLOYMENT DATA

As noted in this Policy, we collect Employment Data to support our workforce recruiting, management and retention efforts. We do not, however, process any categories of sensitive personal information (as defined by applicable law) for purposes of inferring characteristics about you.

HOW WE USE EMPLOYMENT DATA

We use Employment Data to support and administer our employee hiring, recruitment, management and retention efforts, and to conduct our business. We may combine any or all the information we collect or obtain. Examples of the purposes for which we use information include:

- **To support our employment recruiting efforts**, including to consider your application for employment, determine suitability for employment; perform recruitment and evaluate the tools and services we use during the recruitment process.
- **To respond to you**, including when you make a request or inquiry; enter a company contest; complete a survey; or share a comment or concern.
- **To support our workforce**, including to review and evaluate job performance, determine suitability for employment or promotions, calculate compensation, including wage and salary increases and bonuses, schedule work and monitor attendance, perform headcount planning, recruitment, separation, and succession planning, administer employee activities and programs, investigate and respond to employee complaints, other employment-related incidents, using information necessary or associated with return to work requirements.
- **To provide you with tools and experiences that allow you to perform your job**, including to allow access to workplace productivity software and tools, like directories, email and calendars, travel planning and expense management, and other productivity and collaboration solutions, and provide opportunities for learning and development, training, and certification.
- **To provide employment related benefits** including to administer and provide health, workers compensation, dental, retirement, and other benefit programs.
- **To respond to you**, including when you make a request or inquiry, enter a company contest, complete a career related survey, or share a comment or concern.
- **To communicate with you**, including to send news, business, and policy updates about Nordstrom, share information about benefits and opportunities available to you, and solicit feedback about your employment experience at Nordstrom.
- **For human resources reporting and analytics**, including to create reports for management and government programs, and analyze data to gain insights about our company and our workforce.
- **To operate, evaluate and improve our business**, including to administer payroll, facilitate interactions with our customers (in stores, over the phone, and online), operate and improve our business and business activities, manage our technology, tools, and processes, monitor use of company resources and administer information technology services, maintain programs and records, detect and prevent unauthorized access to or misuse of our technology, tools, and processes, and for any other operational purpose (as permitted by law).
- **For legal and safety purposes**, including to comply with legal and regulatory requirements, protect and Nordstrom, our customers and employees, or third parties, from harm or in legal proceedings, protect our rights, and to respond to court orders, lawsuits, subpoenas, and government requests.
- **For general human resources management and administration**, including for employee career development, performance management, social security, compensation, pension and benefits management, administer payroll and benefit arrangements, insurance, and managing absences.

Please note that while we may collect demographic information from Applicants and Workers, this information is not used to make employment related decisions. In addition, the above list of purposes is not necessarily a complete list and may change from time to time to accommodate our business needs and goals, in accordance with applicable law.

WHO MAY ACCESS EMPLOYMENT DATA?

We think it is important for you to know that we will never sell Employment Data or share it with third parties for advertising purposes. We do, however, need to disclose Employment Data to manage our hiring and workforce management processes, including to transfer Employment Data for Canadian Applicants and Workers to the United States. We may share Employment Data to certain employees within Nordstrom as well as other third parties as explained below.

Inside Nordstrom. Access to Employment Data is restricted to those Nordstrom employees who need access to perform their job. For example, if you are an Applicant, your Employment Data (e.g. your resume or job application) will be disclosed to the hiring manager to evaluate your suitability for the role. Or, if you are a Worker, your manager will have access to relevant Employment Data for career development and performance management.

For Workers, as noted in the Nordstrom Expectations policy, Nordstrom may access emails sent to and from Workers using the company email account, including on Nordstrom issued or personal devices (where a Worker's company email account is used on the device for business purposes). Any access will always be conducted in accordance with applicable law.

Outside Nordstrom. We disclose Employment Data to authorized third-party service providers including those third parties that support our recruitment processes by screening and verifying information contained in a job application and academic or professional qualifications. We may also disclose Employment Data with third parties that support the employment process including benefits, health and retirement plan providers. In all cases, access to your Employment Data by third parties is limited to those that need access to the information to deliver their services.

We may also disclose your Employment Data with a third party to enable contact with you in the normal course of business, for example, by providing your contact details such as your email address or phone number.

Very rarely, we may need to disclose your Employment Data to third parties such as:

- Where required by law.
- In response to a legitimate request for assistance by the police or other law enforcement agency.
- To seek legal advice from Nordstrom's external advisers, including but not limited to legal counsel, in connection with a dispute with a third party or to investigate an allegation against a Worker or third party; or
- In connection with any strategic transaction involving Nordstrom, such as a sale, purchase or merger.

While we may share your Employment Data with third parties as described above, we never sell or share Employment Data for interest-based or targeted marketing purposes.

HOW LONG WILL NORDSTROM RETAIN EMPLOYMENT DATA?

We retain all categories of Employment Data for as long as is necessary in relation to your employment with Nordstrom, our administration of benefits or as long as we need to meet our legal obligations or business requirements.

YOUR OPTIONS

Nordstrom will take appropriate steps to ensure that Employment Data is accurate and complete as reasonably necessary; you are responsible for providing us with any changes in your Employment Data so that we can make updates and maintain accurate records. We provide Applicants and Workers the right to request that we update your contact details. You can do so at any time by logging into your Workday account and making the change. If we need additional information to confirm the requested change, we'll reach out to you.

DATA SECURITY

Nordstrom has implemented appropriate technical and organizational measures and has entered into appropriate contractual agreements with third-party service providers to protect and secure your Employment Data against loss or unauthorized access or alteration. Access to your Employment Data is strictly controlled through implementation of system security on the Nordstrom network and our human resources information management system. In addition, access to Employment Data is limited to those Nordstrom Employees who have a need to access that information to perform their job.

REPORTING AND ENFORCEMENT

At Nordstrom, employees are expected to handle Employment Data in accordance with this Policy. Employees are also expected to report any illegal or unethical behavior immediately to any leader, Human Resources, the Employee Contact Center, or the Office of Ethics and Compliance. Employees may also anonymously report concerns by calling 888.832.8358 or by visiting [Nordstrom.ethicspoint.com](https://www.nordstrom.com/ethics). For additional information see the [Code of Conduct & Ethics](#) available within [mynordstrom.com](https://www.nordstrom.com).

FOR CALIFORNIA APPLICANTS AND EMPLOYEES

In the preceding twelve months, Nordstrom has disclosed the following categories of personal information to the following categories of recipients:

Category of Personal Information	Category of Recipient
Identifiers	Benefits administrators, payroll processors, personnel management providers, legal service providers, IT and security providers
Characteristics of protected classifications	Benefits administrators, payroll processors and personnel management providers
Commercial information	Legal service providers, IT and security service providers
Internet or other electronic network activity information	IT and security service providers
Geolocation data	IT and security service providers
Audio, electronic, visual or similar information including	Personnel management providers, IT and security service providers
Professional and employment information	Personnel management providers
Inferences	Personnel management providers

California law grants certain rights to Workers residing in California. If you are a Worker residing in California this section applies in addition to all other applicable rights and information contained within this Policy.

As a Worker residing in California, you can request that Nordstrom:

- To know more about and access your personal information.
- That we correct your personal information that is inaccurate.
- That we delete your personal information.

We feel it’s important for you to know, as we’ve already stated in this Policy, we never sell your Employment Data, nor do we share it with third parties for behavioral advertising purposes. In addition, we only use Employment Data for specific purposes such as to identify an employee for tax purposes or administer worker’s compensation claims.

Please note that some rights can be exercised by you directly, in particular if you have a Workday account with us; see the “Your options” section for information. In addition, California law also gives you the right to request that we limit the use of your “sensitive” personal information. Nordstrom does not use any sensitive personal information to make inferences about you and uses sensitive personal information only for reasons permitted by the California Consumer Privacy Act, as amended by the California Privacy Rights Act.

We will not retaliate or otherwise discriminate against a Worker that legally exercises any of the above rights. It is important to note that the above rights are not absolute, so while you may request to know, delete, correct, opt out of sharing or selling your Employment Data, or that we not process sensitive Employment Data, Nordstrom may not be legally required to comply with your request. We will evaluate any request to exercise the above rights on a case-by- case basis and will respond to that request as required by applicable law. A request may be submitted through our onlineform located [here](#) or by calling our Employee Contact Center at 1-855-667-3947.

Identity Verification Requirement. The law requires that we validate the identity and legal authority associated with any personal information request for a California Worker. As a result, we may require that you take additional steps to validate your identity and legal authority, particularly where you make a request through our online form or in writing (email or postal mail).

As a California Worker, you may designate an authorized agent to submit a request on your behalf. If you make a request, we will send a message to the email address you provided in your request and you must follow the instructions in that email for us to verify your request. We will begin processing your request once you have completed the verification process.

We will provide a response to any personal information request within the timeframe required by law. If we cannot substantively respond to your request in a timely manner, we will notify you and provide the reason for the delay.

Please note that some information we collect, and store may not be subject to California law or the rights granted under California law. Additionally, under certain circumstances we may not be able to fulfill your request, or the law may provide us with exceptions to fulfilling your request, including where doing so would interfere with our regulatory or legal obligations, where we cannot verify your identity, if your request involves disproportionate cost or effort, we need to retain the information to fulfill a legal obligation, prevent fraud or any other purpose permitted by law. But we will respond to your request within a reasonable time, as required by law, and provide an explanation.

If you act in the capacity as a Nordstrom customer, we may collect information about you that is unrelated to your employment or potential employment. More information about our privacy practices and your rights as a customer can be found at our [Privacy Policy](#).

Appeals Process. If you wish to appeal a decision we have made with regard to your personal information, you will need to submit an Appeals request to privacy@nordstrom.com within 30-days of our final response on your request. Your email must include first and last name, the email address used to submit the request, and the request ID (provided at the time the request is submitted).

CONTACT US

If you have questions about this Careers Privacy Policy or our privacy practices associated with Employment Data, please contact us at:

Nordstrom Privacy
PO Box 21986
Seattle, WA 98111-3986
1.866.554.6591
privacy@nordstrom.com

UPDATES TO THIS POLICY

We may update or make changes to this Policy from time to time and may apply any changes to information previously collected, as permitted by law. When we make material changes to this Policy, we will notify you by posting the updated Policy, and we will update the effective date at the end of this Policy.

EFFECTIVE DATE

This Policy is effective January 2024.