

PRIVACY NOTICE
MAST GLOBAL BUSINESS SERVICES INDIA PRIVATE LIMITED
INDIA

This notice ("Notice") will provide you with information on our data processing activities with respect to certain personal data about employees of Mast Global Business Services India Private Limited ("Company" or "we"), located in India.

I. YOUR PERSONAL DATA

We will process certain individually identifiable information about you as a Company employee that we collect during your job interview process, at the start of your employment and in the course of your employment ("Personal Data"). In addition to the other processing referred to in this Notice, we locally process your Personal Data to the extent permitted or required under applicable law, for purposes connected with your employment, such as human resources and payroll management and administration. The Personal Data categories that we process locally are listed in the Annex, which include contact information, compensation and benefits information, and information on your role in our organization. The list in the Annex is divided into different classes of Personal Data as we do not collect, use and process all Personal Data for the same purposes.

Your Personal Data may also be processed where the Company reasonably considers it necessary for the purposes of complying with legal or regulatory obligations, investigating infringements of the law or Company policies (including disciplinary and grievance matters) and establishing, exercising or defending legal rights of members of the global group of entities affiliated with the Company (the "Company Group"). Your Personal Data will also be processed in the operation and management of Company Group systems which systems may be hosted internally or externally.

II. PROCESSING AND DATA TRANSFERS

We may process and transfer your Personal Data, or part thereof, to other parties as described below under the section on "Recipients," as permitted under applicable data privacy law for the following purposes:

- Directory Information: To facilitate global cooperation, communication and teamwork within the Company Group and to provide for a global directory.
- HR and Workforce Management Data: To plan and manage human resources on a global level, including but not limited to general workforce management, recruiting and employee on-boarding; determining the suitability for employment or promotion; appropriate staffing and evaluation of workforce members for their qualification for a particular job or project; project and event management; workforce reporting and analytics, performing workforce assessments, asking you for feedback on particular issues, and succession and strategic planning; cross-border teamwork, global cooperation, communication, promotions, secondments, and transfers within the Company Group; analysis and improvement of our services; management of attendance, absences, leaves of absences, and vacations; maintenance of records relating to business activities, budgeting, and managing finances; arranging and facilitating work-related travel;

administration of your compensation, performance of global payroll management and/or processing; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; reimbursement of expenses; providing and managing employee discounts; providing to you offers of products and services that would be of interest by virtue of the employment relationship with us (including without limitation family and friends discounts, and special rates on insurance and benefits); administration of health, dental, and other benefits (where applicable); awards and administration of equity or other types of rewards; accounting and allocating salary and other compensation expenses among members of the Company Group that benefit from contributions by employees of the Company; financial forecasting and implementing investment and budgeting decisions; employee assistance; consistent training, career development and performance management; compliance management tasks (training, assessment, management); responding to incidents; ensuring business continuity; protecting the health and safety of our staff and others; facilitating communication in an emergency; compliance with legal or regulatory obligations such as tax, record-keeping and reporting obligations; investigation of infringements of the law, of policies of the Company Group (including ethics, disciplinary and grievance matters), and of suspected misconduct or non-performance of duties; detecting or preventing theft or fraud, or attempted theft or fraud; facilitating the reporting and processing of reports of certain illegal or unethical activities via our ethics hotline; establishing, exercising or defending legal rights of the Company Group; managing claims and legal matters; complying with requests from government or other public authorities; responding to legal process such as subpoenas and court orders; securing immigration statuses (where necessary); allowing for due diligence investigations in the context of actual or potential mergers-and-acquisitions (“M&A”) transactions; managing and facilitating mergers, acquisitions, liquidations, sales, reorganizations or disposals, and integrating with purchasers.

- Compensation and Benefits Data: To provide third party stock and benefit plans administration services, and assist the Company Group in discharging essential functions regarding its equity compensation and benefit plans.
- IT Data: To operate, monitor, manage, maintain and provide you with access to corporate facilities, hardware, software, communications systems, office equipment and other resources used by the Company Group, provide technical support, protect data, and prevent security breaches. This includes, without limitation, the monitoring of the use of any company IT and communications systems in order to collect information and protect people and property. For example, we may use video and surveillance technology in our stores and in our facilities; and we may intercept, access, use, and disclose communications (such as email) that traverses our company network and assets (e.g., computers and phones).
- Ethics Hotline Data: To facilitate the administration of an ethics hotline and provide for internal investigations and oversight related to the hotline.

The Company may transfer Personal Data to the recipients described below to the extent permitted and necessary to conduct business.

III. RECIPIENTS

The following recipients or categories of recipients will receive access to some of your Personal Data.

A. Global Office Directory

For the purposes described in Section II of this Notice, Directory Information will be made available to the workforce members of the Company Group as part of a global office directory. The global office directory is stored on servers operated by or on behalf of the Company Group including, particularly, Victoria's Secret & Co., Mast Technology Services Inc. and Mast Global Business Services India Private Limited. The controller of your Directory Information stored in the global office directory is Victoria's Secret & Co.

B. HR Management and Administration

If and to the extent necessary in the individual case for the purposes described in Section II of this Notice, we share your HR and Workforce Management Data, your Compensation and Benefits Data, your IT Data, and/or your Ethics Hotline Data with Victoria's Secret & Co., Mast Technology Services Inc. and Mast Global Business Services India Private Limited. The controller of your respective Personal Data are the Company and Victoria's Secret & Co.

C. Global Human Resources Applications

We will include certain HR and Workforce Management Data, Compensation and Benefits Data and/or IT Data in human resources information systems ("HRIS"), which are applications and data stores that assist the Company Group administer human resources and employee compensation at an international level and permit employees to manage their own Personal Data in some cases. Our parent company, Victoria's Secret & Co. in the U.S., may host such servers or may utilize third party servers. This transfer of Personal Data will enable the Company Group to benefit from improved cross-border human resources management and to centralize payroll and benefits administration, which will reduce costs and minimize data transfer between Company Group entities by less secure means.

With the exception of Directory Information, which is available to everyone in the Company Group to facilitate cooperation, only authorized employees with a need to know have access to the Personal Data.

D. Service Providers, Third Parties

In addition, we may make certain that your Directory Information, HR and Workforce Management Data, Compensation and Benefits Data, IT Data and/or Ethics Hotline Data are available only to service providers who need it to perform contracted services or to other third parties, as permitted under applicable data privacy law.

E. Authorities and Other Third Parties

In addition, we may share Personal Data with local authorities and other parties in accordance with local regulations, or as part of internal investigations within the

Company Group. Your Personal Data also may be shared and/or transferred to respond to internal or external audit and inquiries, law enforcement requests, requests from administrative or judicial authorities, where required by applicable laws, court orders, or government regulations, or in the event we sell or transfer all or a portion of our business assets (including, without limitation, in the event of a merger, acquisition, joint venture, reorganization, dissolution, or liquidation).

F. Cross-Border Data Transfer Generally

Many of these recipients will be located or may have relevant operations outside of your country, such as in the United States and India.

IV. RETENTION PERIODS

Personal Data will be stored only as long as necessary to meet legitimate business needs.

V. HOW CAN YOU ACCESS YOUR PERSONAL DATA OR OBTAIN MORE INFORMATION?

Under applicable law, you may have, among others, the rights: (i) to check whether and what kind of Personal Data we hold about you and to access or to request copies of such data, (ii) to request correction, supplementation or deletion of Personal Data about you that is inaccurate, and (iii) to request the Company to stop the collection, processing or use of Personal Data about you, except to the extent required or permitted under applicable statute or other law. In certain circumstances, you also may have the right to object for legitimate reasons to the processing of your Personal Data in accordance with the procedures set forth in the applicable data protection regulations and to seek other legal remedies available to you in connection with the processing of Personal Data. We will honor these rights, where required, in accordance with the applicable law.

Please address such request and any other questions concerning this Notice to the Privacy Office at VSprivacy@victoria.com.

Visit [HR Access online](#) to review the latest version of this Notice, or contact the Privacy Office at VSprivacy@victoria.com to receive a copy.

ANNEX

Categories of Personal Data

Directory Information: Generally available contact information, includes information such as:

- Name format type
- Prefix (Mr./Mrs./etc.)
- First name
- Preferred Name
- Middle name
- Last name (Family Name)
- Former Last Name (Maiden Name)
- Suffix
- Job code
- Reports to position number and name
- Office e-mail address
- Office phone number
- Cellular phone number
- Employment Location and Address
- Job title
- Employee ID
- Photographs (or Profile Picture)

HR and Workforce Management Data: Qualified HR Data, includes information such as:

- National ID Type
- National ID
- Country (that has issued the National Identification document)
- Regulatory Region
- Citizenship Status
- Citizenship Country (names a country as opposed to the status above).
- Nationality
- Date of Birth and Age
- Gender
- Family Members' Names and Status
- Language Skills
- Passport Issue Country
- Passport Issue City
- Passport Issue State
- Passport Expiry Date
- Visa Status and ID Number
- Country - for Visa/Permit (Country Name for which visa is applied/granted)
- Visa Effective Date
- Visa Type (Work Permit/Business/etc.)
- Visa Contract
- Visa Expiry Date
- Personal Address

- Emergency Contact Names and Relation
- Emergency Contact, Primary Contact
- Emergency Contact Phone
- Emergency Contact Information
- Employment and Office Location
- Employment Action (Hire/Rehire/Termination)
- Reason for Employment Action (Hire/Rehire/Termination/Leave)
- Job Code
- Reports To Position Number and Name
- Employee Classification
- Employee ID Number
- Employment Status
- Type of Contract
- Contractual starting date
- Contractual end date
- Probation Period
- Education and Employment History
- CV or Resume
- Job References (where applicable)
- Information on Language and Other Job-Related Skills
- Historical Compensation Details (where legally permissible)
- Continuous Service Date
- Job classification
- Full time/ Part time status
- Part time percentage
- Job Title and Job Title Code
- Job Description
- Department
- Sub-Department
- Region
- Market
- Project and Project allocation
- Cost Center and Cost Center allocation
- Supervisor (Employee Name and ID)
- Work Period (Weekly/Monthly/etc.)
- Salary Administration Plan
- Salary Grade
- Compensation Rate Code
- Compensation Rate
- Supplemental salary
- Overtime compensation
- Bonus compensation
- Other variable compensation
- End of Service payment and accruals
- Holiday salary deduction
- Holiday compensation and accruals
- Other leave salary deduction

- Other leave compensation
- Not taken holidays compensation
- All company paid expenses, benefits and benefits in kind
- Housing Allowances
- Travel Allowances
- Car or Commuting Allowances
- Other Allowances (Cost of Living, Mobile Phone, etc.)
- Payment Card Information
- Purchase Information
- Employee expenses
- Paid Time Off or Leave of Absence
- Third Party Payments (when the employee is on leave for long-term sickness, accident at work or other reason.)
- Paycheck details include the following (where applicable):

- a) Total Gross Salary
- b) Employee's wage tax (withheld by the employer)
- c) Employee's compulsory Social Security deduction
- d) Employee's compulsory retirement deduction
- e) Employee's compulsory unemployment deduction
- f) Employee's additional medical care deduction
- g) Other compulsory or additional employee's deductions
- h) Employee's voluntary retirement deduction
- i) Employee's voluntary medical care deduction
- j) Other Employee's voluntary deductions
- k) Total Employee Deductions
- l) Total Net Salary
- m) Stock purchase plan deduction, if made available
- n) Expenses refund and advances
- o) Expatriate expenses refund
- p) Benefits in Kind deduction
- q) Other Net adjustments
- r) Salary Advance Adjustments
- s) Third Party payments (net)
- t) Total Net Adjustments
- u) Net to Pay

- Education
- Information on Eligibility and Fitness for Work
- Company Training History
- Performance Evaluation and Rating History
- Disciplinary Action (e.g., performance improvement plan, written warning)
- Information on Use of Company IT and Communications Resources
- Birth Country
- Birth City
- Marital and Family Status
- Number of Dependents – Children
- Number of Dependents - Adults
- Dependent Details (Name, Date of Birth, Relationship)

- Offenses and criminal proceedings
- Days of absence taken per year (but not including health related Personal Data)
- Group Insurance Policy Information (e.g., policy number, health insurance information)
- Disability Status (where applicable and legally required)
- Photographs - for identification purposes (*example*: company directory) or security purposes (*example*: identification badge)
- All Personal Data required to provide data subjects (1) access to company computer systems and networks and (2) tools to electronically communicate within the Company Group, including but not limited to IP address and user login name.
- Banking Details, including the following:
 - a) IBAN (International Banking Account Number) or BBAN (Basic Bank Account Number)
 - b) BIC (Bank Identifier Code) or SWIFT code
 - c) Account currency
 - d) Name on the bank account
 - e) Bank name
 - f) Percentage or amount transfer to bank

Compensation and Benefits Data: Stock, Incentive, and Benefit Plans Administration
 Service Provider Data, includes information such as:

- Name format type
- Prefix (Mr./Mrs./etc.)
- First name
- Middle name
- Last name
- Country (that has issued the National Identification document)
- Citizenship Status
- Citizenship Country (names a country as opposed to the status above)
- E-mail address
- Social Security Number, National Insurance Number, Personal Public Service Number, Social Insurance Number, or the equivalent
- Employee ID, other than Social Security Number for non-US employees
- Employment Action (Hire/Rehire/Termination) – Date of hire
- Employment Action (Hire/Rehire/Termination) – Termination date
- Tax jurisdiction
- Tax ID Number
- Tax withholding rate
- Annual Salary
- Payroll entity responsible for reporting of income and taxes
- General Ledger code (including business unit and department information)
- Home address
- Date of Birth

IT Data: IT operation, monitoring, management and maintenance information, includes information such as:

- Name format type
- Prefix (Mr./Mrs./etc.)
- First name
- Middle name
- Last name
- Employee ID Number
- Employee Status
- Department
- Job code
- Reports to position number and name
- Photographs - for identification purposes (*example*: company directory) or security purposes (*example*: identification badge)
- Video and audio recordings - for security purposes (where legally permissible)

Ethics Hotline Data: Compliance data, related to ethics hotline complaints and investigations, which may include information concerning the reporter or others who may know about the issue such as:

- First Name
- Last Name
- Employee ID Number
- Employee Location and Address
- Employee Status
- Department
- Reported Information
- Disciplinary Action (e.g., performance improvement plan, written warning)
- Information on the data subject's use of company technology systems and networks (to the extent relevant to the investigation)