

DATA PROCESSING NOTICE | HUMAN RESOURCES

Mast Industries UK Limited

This notice ("**Notice**") will provide you with information on the processing of personal data about employees ("**you**", "**your**") of Mast Industries UK Limited ("**Victoria's Secret**", "**we**", "**us**", "**our**") by or on behalf of Victoria's Secret & Co.

Unless stated otherwise below in this Notice, the controller responsible for the processing of your personal data is the Victoria's Secret entity named above which is employing you.

I. YOUR PERSONAL DATA SUBJECT TO PROCESSING

We will process certain personal data about you as a Victoria's Secret employee that we collect during your job interview process, at the start of your employment and in the course of your employment ("**Personal Data**") from you or authorized third parties such as your supervisor or public authorities, for the purposes stated in Section III of this Notice.

The Personal Data we collect includes, for example, information about how to contact you, your role and compensation as a Victoria's Secret employee and your banking details. We collect 'sensitive Personal Data' such as information about your religious affiliation, ethnicity, and health status, only in accordance with applicable legal requirements.

Please refer to the **Annex** to this Notice for full details of your Personal Data we collect and otherwise process. The list in the **Annex** sets forth different categories of Personal Data as we do not collect, use and otherwise process all Personal Data for the same purposes (see Section III of this Notice).

II. LEGAL BASES FOR OUR PROCESSING OF YOUR PERSONAL DATA

In general, the legal bases for our processing of your Personal Data according to the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") are (i) the necessity of the processing to enter into or perform the employment contract with you (Article 6(1)(b) GDPR), (ii) the necessity of the processing to comply with legal obligations to which Victoria's Secret is subject (Article 6(1)(c) GDPR), (iii) the necessity of the processing for legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms (Article 6(1)(f) GDPR), or (iv) your consent to the processing for one or more specific purposes (Article 6(1)(a) GDPR).

This applies with the exception of sensitive Personal Data such as, without limitation, your religious affiliation, your ethnicity, and your health status. Sensitive Personal Data are processed by us based on (i) the necessity of the processing for carrying out the obligations and exercising specific rights of us or you in the field of employment and social security and social protection law in so far as authorized by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for your fundamental rights and freedoms (Article 9(2)(b) GDPR), (ii) the necessity of the processing for the establishment, exercise or defense of

legal claims (Article 9(2)(f) GDPR), or (iii) the necessity of the processing for the purposes of preventive or occupational medicine, for the assessment of your working capacity as employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law, provided the data is processed subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies (Article 9(2)(h) GDPR).

III. PURPOSES FOR OUR PROCESSING/TRANSFERRING OF YOUR PERSONAL DATA

Depending on the circumstances of the individual case, we process your Personal Data for the following purposes:

- To plan and manage human resources pertaining to your employment on a global level including, but not limited to, general workforce management, recruiting and employee on-boarding; determining suitability for employment or promotion; appropriate staffing, evaluating 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;
- To provide for a global office directory of workforce members, their roles and positions and pertaining contact details;
- To implement, execute and facilitate cross-border teamwork, global cooperation, communication, promotions, secondments and transfers within the global group of companies that are part of or support Victoria's Secret entities ("**Victoria's Secret Entities**");
- To analyze and improve our services;
- To manage attendance, absences, leaves of absences, and vacations;
- To operate, monitor, manage, maintain and provide you with access to corporate facilities, hardware, software, communications systems, office equipment and other resources used by Victoria's Secret Entities and provide technical support;
- To maintain records relating to business activities, budgeting, and managing finances;
- To arrange and facilitate your work-related travel;
- To administer your compensation and benefit programs and perform payroll management or processing;
- To determine eligibility for, and process, salary increases, bonuses, and other incentive-based compensation;
- To reimburse expenses and provide employee discounts;
- To present 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);
- To administer health, dental, and other benefits (where applicable);
- To award you and administer equity or other types of rewards;
- To perform accounting and allocating salary and other compensation expenses among the Victoria's Secret Entities that benefit from contributions by employees of EU/EEA Victoria's Secret Entities;
- To perform financial forecasting and implement investment and budget decisions on a global scale;

- To provide for consistent training, career development and performance management;
- To respond to incidents, ensure business continuity, protect the health and safety of staff and others, and facilitate communication in an emergency;
- To carry out compliance management tasks (training, assessment, management);
- To comply with legal or regulatory obligations such as tax, record-keeping and reporting obligations, investigate infringements of the law, of policies of Victoria's Secret Entities (including disciplinary and grievance matters), and of suspected misconduct or non-performance of duties;
- To detect or prevent theft or fraud, or attempted theft or fraud;
- To facilitate the administration of an ethics hotline and provide for internal investigations and oversight related to the hotline;
- To comply with requests from government or other public authorities, and respond to legal process such as subpoenas and court orders;
- To secure immigration statuses (where necessary);
- To allow for due diligence investigations in the context of actual or potential mergers-and-acquisitions ("M&A") transactions; manage and facilitate mergers, acquisitions, liquidations, sales, reorganizations or disposals; and integrate with purchasers.

For the following purposes, we may transfer a subset of your Personal Data to third parties as described in Section IV of this Notice:

- Directory Information: Providing for a global office directory of workforce members, their roles and positions and pertaining contact details; implementing, executing and facilitating cross-border teamwork, global cooperation, and communication within the global group of Victoria's Secret Entities;
- HR and Workforce Management Data: Planning and managing human resources on a global level, including but not limited to general workforce management, recruiting and employee on-boarding; determining suitability for employment or promotion; appropriate staffing and evaluating 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 Victoria's Secret Entities; analyzing and improving our services; managing attendance, absences, leaves of absences, and vacations; operating, monitoring, managing, maintaining and providing you with access to corporate facilities, hardware, software, communications systems, office equipment and other resources used by Victoria's Secret Entities and providing technical support; maintaining records relating to business activities, budgeting, and managing finances; arranging and facilitating your work-related travel; administration of your compensation and benefit programs, performance of global payroll management and/or processing; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; reimbursing expenses; providing employee discounts; administering 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 the Victoria's Secret Entities that benefit from contributions by employees of EU/EEA

Victoria's Secret Entities; financial forecasting and implementing investment and budgeting decisions; 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 Victoria's Secret Entities (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; establishing, exercising or defending legal rights of Victoria's Secret Entities; 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 M&A transactions; managing and facilitating mergers, acquisitions, liquidations, sales, reorganizations or disposals; integrating with purchasers; and having Victoria's Secret Entities including, particularly, Mast Industries UK Limited and Mast Global Business Services India Private Limited provide secure global systems as service providers to other Victoria's Secret Entities where all Victoria's Secret Entities can process Personal Data, including payroll and benefits information relating to their own workforce members.

- Compensation and Benefits Data: Providing third party stock and benefit plans administration services and assisting the Victoria's Secret Entities in discharging essential functions regarding its equity compensation and benefit plans.

When required by local law to collect Personal Data revealing, for example, racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation then this information will not be transferred outside of the United Kingdom unless permitted by applicable law.

IV. RECIPIENTS OF YOUR PERSONAL DATA

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 III of this Notice, Directory Information will be made available to the workforce members of all Victoria's Secret Entities as part of a global office directory. The global office directory is stored on servers operated by or on behalf of Victoria's Secret Entities including, particularly, Mast Industries UK Limited 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 III of this Notice, we share your HR and Workforce Management Data, Ethics Hotline Data, and/or your Compensation and Benefits Data with Mast Industries UK Limited, and Mast Global Business Services India Private Limited. The controller of your respective Personal Data is Mast Industries UK Limited and Victoria's Secret & Co.

C. Global Human Resources Applications

We will include certain HR and Workforce Management Data and/or Compensation and Benefits Data in human resources information systems ("HRIS"), which are applications and data stores that assist the Victoria's Secret Entities administer human resources and employee compensation internationally and permit employees to manage their own Personal Data. Our parent company, Victoria's Secret & Co. ("Parent") in the U.S., may host such servers or may utilize third-party party servers but, in either case, will be responsible for the processing of the Personal Data via the HRIS. This transfer of Personal Data will enable the Victoria's Secret Entities to benefit from improved cross-border human resources management and to centralize benefits administration, which will reduce costs and minimize data transfer between Victoria's Secret Entities by less secure means.

D. Ethics Hotline Data

We will facilitate the administration of an ethics hotline and provide for internal investigations and oversight related to the hotline.

E. Service Providers

We make certain of your Directory Information, HR and Workforce Management Data, Ethics Hotline Data, and/or Compensation and Benefits Data are made available to service providers on a "need-to-know" basis. By way of example, certain HR and Workforce Management Data will be available to service providers rendering employment, HR compensation and benefits services or related support.

F. 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 Victoria's Secret Entities. 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).

V. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Various of the recipients of Personal Data discussed in Section IV above will be located or may have relevant operations outside of your country, such as in the United States, where the data protection laws may not provide a level of protection equivalent to the laws in your jurisdiction. By entering into appropriate data transfer agreements or implementing other appropriate safeguards to provide an adequate level of data protection, we have confirmed that Victoria's Secret Entities including, particularly, Mast Industries UK Limited and Mast Global Business Services India Private Limited. will provide an adequate level of protection for your Personal Data. You can ask for a copy of such appropriate safeguards by contacting

Attn: Privacy Matter
Victoria's Secret & Co. Legal Department
4 Limited Parkway
Reynoldsburg, OH 43068
US
VSpivacy@victoria.com

VI. RETENTION PERIODS APPLICABLE TO PERSONAL DATA

We will process and keep your Personal Data for as long as is necessary for the purposes set out in this Policy, for legitimate business needs, and for compliance with the law.

VII. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

Subject to the conditions set out in the applicable law, you have, without limitation, the rights to (i) inquire whether and what kind of Personal Data we hold about you and how it is processed, and to access or request copies of such Personal Data, (ii) request the correction or supplementation of Personal Data about you that is inaccurate, incomplete or out-of-date in light of the purposes underlying the processing, or to (iii) obtain the erasure of Personal Data no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, processed for legitimate interests that, in the context of your objection, do not prove to be compelling, or processed in non-compliance with applicable legal requirements. In addition, you have, subject to the conditions set out in the applicable law and without limitation, the rights to (iv) request Victoria's Secret to restrict the processing of Personal Data in certain situations where you feel its processing is inappropriate, (v) object, in certain circumstances, to the processing of Personal Data for legitimate interests, and to (vi) request portability of Personal Data that you have actively or passively provided to us (which does not include data derived or inferred from the collected data), where the processing of such Personal Data is based on consent or the employment contract with you and is carried out by automated means. In case of concerns, you also have the right to lodge a complaint with the competent local data protection authority.

You may exercise the above-mentioned rights of access, rectification, erasure, restriction, objection and data portability against Victoria's Secret.

Miscellaneous

For further information about this Notice, or to exercise any rights with respect to your Personal Data, please contact the Victoria's Secret Privacy Office at VSpivacy@victoria.com.

This Notice does not form part of your contract of employment with Victoria's Secret. Victoria's Secret may issue further guidance or amendments to this Notice from time to time to reflect changes in our Personal Data practices and/or legal requirements.

This Notice was last updated on August 2, 2021.

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
- Company Cellular Phone Number
- Employment Location and Address
- Job Title
- Employee ID
- Photograph (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
- Father's Name
- Language and Other Job-Related 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
- Itineraries and Similar Business Travel Information
- Personal Address
- Emergency Contact Name
- Emergency Contact Same Address as Employee (Y/N)
- Emergency Contact, Primary Contact (Y/N)
- Emergency Contact Same Phone as Employee (Y/N)
- Emergency Contact Information (if not same)
- 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)
- 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
- Other Leave Compensation
- Non-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
- Employee Expenses
- Stock Administration Plan
- Paid Time Off or Leave of Absence
- Education
- Information on Eligibility and Fitness for Work
- Company Training History
- Performance Evaluation and Rating History
- Disciplinary Actions and Proceedings (if any)
- 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
- Reason for Employment Action (Hire/Rehire/Termination)
- 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)
- All Personal Data required to provide data subjects (1) access to company computer systems and networks and (2) tools to electronically communicate via computer and communications networks, including but not limited to IP address and user login name.
- Photographs - for identification purposes (*example*: company directory) or security purposes (*example*: identification badge)
- Video and audio recordings - for security purposes (where legally permissible)
- Offenses and Criminal Proceedings
- Dependent Details (Name, Date of Birth, Relationship)
- End of Service Payment and Accruals
- Holiday Salary Deduction
- Holiday Compensation and Accruals

- Other Leave Salary Seduction
- Paycheck Details Including 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
 - 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
- 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 of Transfer to Bank
- Third Party Payments (when the employee is on leave for long-term sickness, accident at work or other reason.)

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
- Social Insurance Number
- 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
- Details Related to Grants Under the Equity Plans (including but not limited to grant date, number of shares granted, type of shares granted, vesting requirements and stock grants and options exercised).

Ethics Hotline Data: Compliance data, related to ethics hotline complaints and investigations, which may include information concerning the report, reporter, and 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)