

Employment Applicant Privacy Notice

J. C. Penney Corporation, Inc.

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Protecting your privacy

Thank you for visiting the JCPenney careers website. This website (<http://jobs.jcp.com/>) is owned by J. C. Penney Corporation, Inc. (“we”, “us”, “our”, or “JCPenney”) and hosted by a third-party service provider. It provides information on employment opportunities with JCPenney and its subsidiaries, along with other related information. Certain JCPenney subsidiaries and affiliates have their own privacy policies, notices and procedures in place separate and apart from this Privacy Notice. The term “employment applicant”, “applicant” or “you,” as used in this Privacy Notice, means individuals who apply for, or are in the process of being considered for, employment with JCPenney.

We are providing this Privacy Notice to let you know what personal information we may collect from employment applicants, how we use it, how we share it, and how we protect it.

This Privacy Notice applies to the information collected during the JCPenney employment application process and management of that information in any form, whether oral, electronic, or written. We know that many of our applicants are also our customers. To review our Consumer Online Privacy Notice, visit jcpenney.com or click [here](#).

Information we collect from applicants, and how we collect and use it

JCPenney collects personal information that you submit related to your application for employment. JCPenney and its service providers will use the personal information that you submit for purposes related to website registration, the employment application and recruitment process, and any subsequent suitability screening. The following are examples of our collection and use of personal information:

- Your name, username, email address, password, and phone number are collected to allow you to create an online account profile with us to assist you in applying for jobs that interest you;
- Your name, resume, Social Security number, date of birth, address, military status, veteran status, work eligibility, work experience, gender (optional), ethnicity (optional), race, social media handles (optional) are collected along with any documents uploaded (resumes, cover letters, etc.) when applying for a specific position on the JCPenney Career site
- Your name, date of birth, and Social Security number are collected to verify your identity if you receive a conditional offer of employment, and to determine if you are or were previously an employee of JCPenney or its subsidiaries, and to perform a background check if you receive and accept a conditional offer of employment;
- Your Social Security number and date of birth are collected to facilitate identity verification if you need to reset your login password on the JCPenney careers website;

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- Your work history, including dates of employment, job duties, veteran’s status, honors and recognition, professional certifications and training, and educational attainment are collected as part of the application process and are reviewed internally within JCPenney as you are considered for employment;
- If you live in, or have lived in Puerto Rico, we may collect your mother’s maiden name as part of the acknowledgement process for the Fair Credit Reporting Act Disclosure;
- We may collect name and contact information for individuals identified as supervisors or as references by those applying for employment at JCPenney; and
- When visitors to the JCPenney Careers website wish to forward job announcements via the “Share this Job” link found on the site, JCPenney collects the email address of the person to whom the job announcement was forwarded.

When you apply for a position at JCPenney, we maintain your information in our applicant database, so that our recruiters are able to consider you for and contact you about other positions.

If you are hired as an employee of JCPenney, information submitted during your application process may become part of your personnel file.

When a current JCPenney employee applies for another position within the company, information from their associate profile may be used in the process of considering them for such a position.

Information we share with third parties

JCPenney may share applicant information with third-party providers performing certain services for us related to the recruitment, employment, and suitability screening processes. Such third-party providers have access to applicant information solely for the purposes of performing the services specified in the applicable service contract.

Additionally, we may disclose your personal information to courts, law enforcement, or other government agencies in order to comply with legal and regulatory requests, such as to:

- Protect your or JCPenney’s legal claims and interests;
- Defend against potential or actual litigation;
- Abide by applicable law, regulation or contracts;
- Respond to a court order, JCPenney administrative process, or judicial process including, but not limited to, a subpoena or a search warrant; and
- Comply with JCPenney obligations where it is registered with any governmental agency.

JCPenney may also disclose certain applicant information in an emergency where the health or safety of a candidate or other individual may be endangered.

We reserve the right to transfer any personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

Safeguarding the information we collect

We maintain administrative, physical, and technical safeguards designed to protect the personal information we collect.

How we use cookies

We and our service providers may use cookies to customize the look of the site and to recognize you when you use or

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return to our websites. We may automatically receive and store information from your device’s browser including your IP address, cookie information, and the page(s) that you browsed. This information is used to help us understand what kinds of information through the site are of most interest to you. We do not allow other parties to track your online activities over time and across multiple websites when you use the JCPenney careers website.

Links to other websites and social media widgets

You may navigate to other websites from JCPenney websites. When you provide personal information at one of those sites, you are subject to the site operator’s Privacy Notice. We encourage you to read that policy before submitting any personal information.

Our websites and our mobile applications include social media features, for example Facebook, Twitter, LinkedIn, and YouTube widgets. Social media features or widgets are hosted by a third-party site. Your interactions with those features are governed by the privacy policies of the companies that provide them.

Updates to our Employment Applicant Privacy Notice

We may update this Employment Applicant Privacy Notice from time to time and without prior notice to you to reflect changes in our personal information practices. We will indicate at the bottom of the notice when it was most recently updated.

Business and commercial purposes

We may use the personal information we collect for the following business purposes:

- Auditing the interaction with the data subject and concurrent transactions.
- Detecting or preventing security incidents or other illegal activity and prosecuting the responsible parties.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use if the personal information is not disclosed to another third party or used to build a profile or otherwise alter an individual consumer’s experience outside the current interaction.
- Performing services on behalf of JCPenney or its service provider.
- Undertaking internal research for testing, research, analysis, technological and product development.
- Providing support, safety, security, integrity of JCPenney website, products, and services.

Information we collect by Category

JCPenney may collect the following categories of personal information about you which may be used as described in the “How we use your information” section above:

Category	Examples
Identifiers	A real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, telephone number), online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification, education, employment, employment history. Some personal information included in this category may overlap with other categories.
Protected classification	Age (40 years or older), race, color, marital status, gender, veteran or military status.

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Category	Examples
characteristics under California or federal law	
Geolocation data	Physical location
Professional or employment-related information	Current or past job history, resumes or cover letters
Education information (Non-public personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Effective date

Notice was last updated and effective on January 1, 2020.