

Costco Wholesale Corporation California Employee Privacy Notice

Effective Date: January 1, 2023

This California Employee Privacy Notice (“Privacy Notice”) describes how Costco Wholesale Corporation (“Costco”) and its subsidiaries, affiliates, and related entities (collectively, “Costco,” “we,” or “us”) collect and process personal information about its workforce members (including employees and contractors) residing in California. This Privacy Notice supplements the Employee Agreement, other agreements and Costco policies, and may be updated from time to time. If you use our websites or mobile applications, or utilize any Costco service in your personal capacity, the [Costco Wholesale Corporation Privacy Notice](#) applies.

This Notice does not constitute or form part of any contract with you (for example, your Employee Agreement or other contract).

1. How We Collect Information

- Directly from you, during recruitment and hiring (e.g., the application form that you complete during the recruitment process, or in interviews or through the completion of any tests or surveys), as well as from specific third-party sources (e.g., references and background checks);
- Directly from you, when you input the information into one of our Human Resources (“HR”) systems or otherwise provide it to a representative of the company;
- Created by you and others, when information about your employment is generated by you, your managers, and other employees;
- Automatically, when you physically enter a Costco location or office, use a device issued by Costco, or use a technology system operated by Costco.

2. Information We Collect

To carry out the purposes of processing listed in this Policy, we may collect, store, and process the information listed below. CCPA requires us to list categories of personal information using the categories enumerated in the law; those categories are listed in the column on the right.

Category	Examples of Information Collected	California Consumer Privacy Act Categories
Personal Details	Home address and phone number, personal email address, date of birth, nationality, citizenship, race, gender, marital status, government identifiers (e.g., Social Security number, passport or driver’s license number), photographs, bank account details, and emergency contacts	<ul style="list-style-type: none">• Identifiers• Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))• Protected classification characteristics under

		<p>California or federal law</p> <ul style="list-style-type: none"> ● Inferences drawn from other information ● Sensitive Personal Information
Basic Work Details	Work contact details, employee number, job title, job description, reporting structure, schedule, working hours, and your terms and conditions of employment	<ul style="list-style-type: none"> ● Identifiers ● Professional or employment-related information
Recruitment Data and Professional Qualifications	Job application materials, background check results (and if applicable, drug tests), employment history, education history, certifications and licenses held; union status (if applicable)	<ul style="list-style-type: none"> ● Professional or employment-related information ● Education Information
Performance Information	Task assignments, coaching, and performance reviews, attendance history (including any leaves or time off); participation in training programs, work-related travel profile and itineraries, and expense reports	<ul style="list-style-type: none"> ● Professional or employment-related information ● Sensory Data (if you are employed in customer service and your calls are recorded)
Compensation and Benefits Information	Wage and salary information, payroll information, benefits selected, and names of your dependents and beneficiaries (of benefit plans and similar) and their contact information	<ul style="list-style-type: none"> ● Identifiers ● Professional or employment-related information
Physical and Electronic Access Records	Credentials we assign to permit you access to Costco facilities and technology, records regarding how and when such credentials are used, and security footage	<ul style="list-style-type: none"> ● Identifiers ● Internet or other similar network activity
Device Information and Usage Details	Details about your use of our company technology, such as computers and mobile devices issued by the company, desk phones, and location phones. Such information may include login credentials, model, serial number, device location, usage data, and operating information; details about your interaction with our technology assets, (such as programs used, the date, time, and length of use sessions), and internet browsing history	<ul style="list-style-type: none"> ● Identifiers ● Internet or other similar network activity ● Geolocation data
Electronic Communications	Messages that you send via any Costco-issued account or via any Costco-issued devices, and any other	<ul style="list-style-type: none"> ● Identifiers ● Sensitive Personal Information (if you

	documents or data you may store on such devices	choose to provide such)
Biometrics	Fingerprint or facial recognitions scans used to authenticate you to Costco systems through a mobile device or reader	● Biometric information

We also collect any other information you elect to provide to us.

We do not collect the following categories listed in the CCPA from workforce members:
Commercial Information

3. How We Use Your Information

We will use your information, for the following business purposes:

- a) To facilitate commencement of your employment and intra-company hiring;
- b) To fulfill our employment contract and facilitate the performance of your job duties, such as for scheduling, tracking fulfillment of job duties, administering changes in job roles (promotions, terminations, and retirement), conducting performance reviews and employee management activities, travel and expense management;
- c) To manage our business and our company workforce, including assessing job conditions and employee satisfaction, workforce planning; conduct training and offer career development opportunities, evaluating efforts to maintain a diverse workforce, and investigate complaints;
- d) Accounting, audit, insurance, tax, and regulatory compliance purposes; and
- e) To maintain the health, safety, and security of our workforce and the workplace, and to safeguard Costco’s assets, interests, and legal rights.

4. How We Share Your Information

We may disclose your information to the following:

- *Service Providers.* All categories of personal information may be disclosed to service providers that we believe need the information to perform a technology, business, operational, or other professional function. This includes service providers who assist with workforce management, such as payroll, recruiting and onboarding assistance, travel services, as well as service providers who require certain employee information in order to provide services to the company, such as suppliers, IT services, maintenance and hosting of our websites, accounting, auditing, and tax services, and other professional services.

- *Benefits Providers.* We may share information with entities who provide retirement, health, and other benefit programs, services, or products to which Costco employees and their dependents or beneficiaries receive access through your employment.
- *Affiliates.* We share information with other entities in our corporate family, for purposes consistent with this Privacy Notice.
- *Legal.* We share information where necessary to comply with applicable law, to respond to requests from law enforcement agencies or other government authorities or third parties, as permitted by law and without your consent when it is necessary to protect our customers, employees, or property; report, investigate, or prevent illegal activities; in emergency situations; or to enforce our rights under our terms of service and policies.

The law also requires us to list the categories of third parties to whom we “sell” personal information. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. We do not sell personal information relating to our workforce members.

If Costco, or any portion of our assets, are acquired by, merged with, transferred to, or invested in by another company, we may share your personal information with that company or other third parties involved in the business transition.

5. Retention of Personal Information

California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information. We utilize the following criteria to determine the length of time for which we retain workforce information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or is otherwise necessary to investigate theft or other activities potentially in violation of Costco’s policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact on workforce members of ongoing retention; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information such as those listed above may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the personal information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and

the maximum retention period may be determined by the purpose for which that information set is used.

The following chart provides additional retention considerations that arise when we apply these criteria to the categories of personal information listed in the CCPA.

Category	Required Information
Identifiers	Personal details about you are maintained through the life of your employment in order to administer the employment relationship. Such details also appear in a variety of documents that are generated on a regular basis throughout your employment. We also maintain identifying details about you for a period of time following your employment, e.g., if required by law, to fulfill any ongoing duties owed to you such as provision of benefits, or so that we may verify your employment to your other prospective employers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Personal details and performance information about you are maintained through the life of your employment in order to administer the employment relationship. Such details also appear in a variety of documents that are generated on a regular basis throughout your employment. Medical and health insurance information may be maintained for the length of time required to provide you with benefits, or longer if relevant to your ongoing employment. We also maintain identifying details about you for a period of time following your employment, e.g., so that we may verify your employment to your other prospective employers.
Protected classification characteristics under California or federal law	Personal details about you are maintained through the life of your employment in order to administer the employment relationship.
Biometric Information	A biometric template or algorithm is stored on Costco devices or applications that facilitate multi-factor authentication using biometrics (such as fingerprint or facial recognition scans). These templates are deleted upon return of the device or when your employment with Costco ends.
Internet or other similar network activity	Internet or other network activity information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected. The retention period may be extended, however, if the information is needed to investigate issues related to security, compliance with company policies, or employee conduct.
Geolocation data	Geolocation information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected.

Sensory Data	Call recordings and visual images are typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected.
Professional or employment-related information	Recruitment data and professional qualifications and performance information are maintained through the life of your employment in order to administer the employment relationship.
Education information	Information submitted in connection with your application for employment at Costco may be maintained for the length of your employment, in order to provide us with a holistic view of your qualifications for job-related tasks or advancement.
Inferences drawn from other personal information	The retention period for this type of information will vary depending on the nature of the underlying document in which the inference is recorded.
Sensitive Personal Information	Personal details about you are maintained through the life of your employment in order to administer the employment relationship.

6. Security

We use physical, technical, and administrative measures designed to protect the information we collect. Unfortunately, no data transmission or storage system is guaranteed to be secure, and Costco makes no specific representation or commitment regarding the security of your Personal Information, except as otherwise required by law.

7. No Expectation of Privacy

Please see the Acceptable Use Notice and Employee Agreement regarding expectations of privacy in Costco’s facilities or when using Costco’s systems. As described there, we may reserve the right to monitor, audit, access, disclose, and/or review any use of Costco’s computer systems at our sole discretion. You should not consider Costco’s communications systems as private, and should have no expectation of privacy in these systems. Costco also physically and electronically monitors its facilities, information technology systems, and corporate network.

8. Your Rights

You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request we correct inaccurate information, and to request in certain circumstances that we delete personal information that we have collected directly from you. You have the right to be free from discrimination based on your exercise of your CCPA rights.

How to Submit a Request

You may submit a request to exercise your rights to know/access, correct, or delete your Personal Information through one of two means:

- By completing the form at www.costco.com/RightsRequest.
- By calling us at 1.800.605.3364.

Upon submission of your request, we will contact you (via the email address provided in your request) with instructions on how to verify the request, after which we will check our records for matching information, and aim to complete requests as soon as reasonably practicable and consistent with applicable law.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

You can review and change much of your Personal Information at www.costco.com/employee-website.html. We encourage you to promptly update your personal information if it changes; for instance, if you move.

You have the right to opt out of the sale or sharing of your personal information. However, Costco does not sell or share personal information relating to our workforce members.

You have the right to request, in certain circumstances, that we limit the processing of your sensitive personal information. However, Costco limits its processing of sensitive personal information relating to workforce members to purposes permitted under California law, and processes such information only as reasonably necessary and proportionate for those purposes. Costco does not use sensitive personal information relating to workforce members for the purposes of inferring characteristics of an individual. Accordingly, Costco does not offer an option to limit further processing of sensitive personal information.

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through the methods described in this Privacy Notice.

9. Updates to this Notice

We may change this Privacy Notice from time to time at our sole discretion. You can see when the Notice was last updated by checking the effective date on the cover of this Privacy Notice. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Notice.

10. Contact Us

Please direct questions and requests related to this Privacy Notice or your Personal Information to US_Privacy@costco.com or write us at PO Box 35128, Seattle, WA 98124.