

**Costco Wholesale Corporation Employee Privacy Notice**  
**Effective Date: January 1, 2026**

This 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). This Privacy Notice supplements the Employee Agreement, other agreements and Costco policies, and may be updated from time to time. If you use our consumer websites or mobile applications, or utilize any Costco service in your personal capacity, the privacy notice posted for that website or application (such as [Your Privacy Rights](#) posted on [www.costco.com](http://www.costco.com)) applies.

This Notice describes Costco’s privacy practices; it does not constitute or form part of any contract with you.

## **1. How We Collect Personal Information Relating to Employees**

- 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, use a technology system operated by Costco, or use a personal device connected to a Costco network or system, or to conduct Costco business.

## **2. Personal Information We Collect**

To carry out the purposes of processing listed in this Privacy Notice, we may collect, store, and process the information listed below. Certain state laws require us to list categories of personal information using the categories enumerated in the law; those categories are listed in the column on the left.

Category	Purposes, Sources and Retention of Information Collected
<b>Identifiers</b>	<u>Examples of Information Collected:</u> Contact information (name, phone number, address, email address); social media handles and account information; unique identifiers (such as those assigned in cookies), photographs, bank account details, and emergency contacts  <u>Source(s) of information:</u> Directly from you; automatically when

	<p>you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information”</p> <p><u>Retention considerations:</u> Identifiers that are associated with an employee are maintained for the length of employment and for an additional 7 years from the date of separation.</p>
<p><b>Additional categories of information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b></p>	<p><u>Examples of information collected:</u> Name, signature, Social Security number, physical characteristics or description, address, telephone number, driver’s license or state identification card number, education, employment, bank account number, credit card number, debit card number, or any other financial information</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p>
<p><b>Protected Classifications under CA or Federal Law</b></p>	<p><u>Examples of information collected:</u> Age (date of birth), nationality, citizenship, race, ethnicity, gender, disability, marital status and veteran status</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<p><b>Professional or Employment related information</b></p>	<p><u>Examples of information collected:</u> Work contact details, employee number, user names, job title, job description, reporting structure, schedule, working hours, your terms and conditions of employment, job application materials, background check results (and if applicable, drug tests), employment history, education history, certifications and licenses held; union status (if applicable)</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p>

	<p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<b>Performance Information</b>	<p><u>Examples of information collected:</u> 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.</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<b>Compensation and Benefits Information</b>	<p><u>Examples of information collected:</u> Wage and salary information, payroll information, benefits selected, and names of your dependents and beneficiaries (of benefit plans and similar) and their contact information</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<b>Education Information</b>	<p><u>Examples of information collected:</u> Schools or courses attended, degrees, certifications, skills, or training obtained, dates of completion, and academic or training honors</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a</p>

	reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below
<b>Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information</b>	<p><u>Examples of information collected:</u> Credentials we assign to permit you access to Costco facilities and technology, records regarding how and when such credentials are used, audio and/or video recordings of meetings or customer-service interactions, and photographs or video surveillance in or around Costco properties and facilities</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<b>Internet or Electronic Network Activity Information</b>	<p><u>Examples of information collected:</u> Details about your use of our company systems and technology, such as company networks, applications, computers and mobile devices, desk phones, and location phones; 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</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<b>Electronic Communications</b>	<p><u>Examples of information collected:</u> Messages that you send via any Costco-issued account or via any device connected to Costco networks or technology, and any other information you transmit or store using such devices or through Costco systems or technology</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p>

	<p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below</p>
<b>Geolocation Data</b>	<p><u>Examples of information collected:</u> Precise geolocation information if location services are enabled on your device</p> <p><u>Source(s) of information:</u> Automatically when you interact with us or use Costco networks or technology</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention Considerations:</u> We dispose of this information on a regular basis when no longer reasonably necessary for a business purpose</p>
<b>Biometrics</b>	<p><u>Examples of information collected:</u> Fingerprint or facial recognition scans used to authenticate you to Costco systems through a mobile device or reader</p> <p><u>Source(s) of information:</u> Automatically when you interact with us or use Costco networks or technology</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention Considerations:</u> We dispose of this information on a regular basis when no longer reasonably necessary for a business purpose</p>
<b>Sensitive Personal Information</b>	<p><u>Examples of information collected:</u> Race or ethnicity, citizenship or immigration status, religion or beliefs, union membership, health information, sex life or sexual orientation, precise geolocation, government identifiers, or financial account information including log-in or passwords</p> <p><u>Source(s) of information:</u> Directly from you; automatically when you interact with us</p> <p><u>Purpose(s) of collection and use:</u> All purposes listed in “Our Use of Personal Information” above</p> <p><u>Retention considerations:</u> Information associated with your employment is maintained for the length of employment and for a</p>

	reasonable time thereafter, as determined under the criteria listed under “Our Retention of Personal Information” below
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We also collect any other information you elect to provide to us. We do not collect commercial information about our employees; however, if you have a Costco membership, commercial information regarding your membership is collected as described in [Your Privacy Rights](#).

### **3. Our Use of Personal Information**

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

- To facilitate commencement of your employment and intra-company hiring;
- 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 and administration of information systems and technology;
- To manage our business and our company workforce, including assessing job conditions and employee satisfaction, analysis of workforce composition and recruiting or retention, workforce planning; conduct training and offer career development opportunities, evaluating efforts to maintain a diverse workforce, and investigate complaints;
- Accounting, payroll administration, audit, insurance, tax, and regulatory compliance purposes; and
- To maintain the health, safety, and security of our workforce and the workplace, and to safeguard Costco’s assets, interests, and legal rights.

Costco limits its use of employee Sensitive Personal Information to what is relevant and necessary for its business purposes. By accepting this policy and your employment with Costco, you consent to the use of your Sensitive Personal Information as described in this Privacy Notice.

### **4. How We Share Your Personal 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; to report, investigate, or prevent illegal activities; in emergency situations; or to enforce our rights under our terms of service and policies.
- *Corporate Transactions.* 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. Our Retention of 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.

## 6. Review and Correction of Your Personal Information

You can review and change your Personal Information at [www.costco.com/employee-website.html](http://www.costco.com/employee-website.html) or by contacting the Human Resources or Payroll representative at your location. We encourage you

to promptly update your personal information if it changes; for instance, if you move.

## 7. 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.

## 8. 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 property or systems. As described there, we may reserve the right to monitor, audit, access, disclose, and/or review any use of Costco's property or computer systems at our sole discretion. You should not consider Costco's communications systems or electronic networks 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, including the content of communications and other traffic through such facilities, systems and network. By accepting this notice and your employment with Costco, you consent to Costco and its service providers interception, monitoring and use of such information as described in this Privacy Notice.

## 9. Privacy Rights of California Residents

If you are a resident of California, you have the right under the California Consumer Privacy Act ("CCPA"), as amended, to receive notice of the categories of personal information we collect, the purposes for which those categories of personal information will be used, the third parties and service provider to which it may be disclosed, and how we determine the length of time for which the personal information is maintained. That information is contained in this Notice above. You also are entitled to receive notice regarding your rights under the CCPA. That information is provided below.

You have the **right to request access to** personal information collected about you. You also have the **right to request we correct inaccurate information**, and the **right to request that we delete personal information** in certain circumstances. You have the **right to be free from discrimination** based on your exercise of your CCPA rights. You also have the **right to have an authorized agent** (another individual or a business registered with the California Secretary of State) to make requests on your behalf through these means.

*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](http://www.costco.com/RightsRequest)
- By calling us at 1-800-605-3364

For your security and to ensure unauthorized third parties do not access your personal information, we require you to verify your identity before we act on your request. 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. Before accepting a request from an authorized agent, we will require the

agent to provide proof you have authorized the agent to act on your behalf, and we may need you to verify your identity directly with us or confirm that you provided the authorized agent permission to submit the request. You must use the [Third Party Authorization form](#) to authorize third parties to make such requests on your behalf.

We may decline your request, or respond to it in a limited way, when permitted by law. If we do, we will give our reasons for doing so in our response to your request.

You have the **right to request that Costco not sell or share your personal information** for targeted advertising or creating profiles. Costco does not sell or share employee information, so we do not provide a method to submit such requests.

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 employees 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 employees for the purposes of inferring characteristics of an individual. Accordingly, Costco does not offer an option to limit further processing of sensitive personal information.

## **10. 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. The most recent version of this Privacy Notice may also be found with the [Your Privacy Rights](#) notice posted at [www.costco.com](http://www.costco.com). 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.

## **11. Contact Us**

Please direct questions and requests related to this Privacy Notice or your Personal Information to [costcoprivacy@costco.com](mailto:costcoprivacy@costco.com) or write us at PO Box 35128, Seattle, WA 98124.