

Data Privacy Notice

The data privacy regulations of some countries require that a person making a report containing personal data be notified of certain collection and retention practices regarding information submitted through this Ethics Helpline, as well as consent to certain terms and conditions regarding the information submitted by that person.

Before using the Ethics Helpline, you must read and accept the terms set forth below. If you agree to the terms, please check the consent box that follows. You will then be able to submit a report or question on the Ethics Helpline. If you do not wish to accept the terms below, we are unable to accept any information through this Ethics Helpline. As an alternative, you can report your concerns to:

- your immediate supervisor or manager,
- Human Resources,
- Legal, or
- the Corporate Ethics Office (CorporateEthics@breadfinancial.com).

The Ethics Helpline is a confidential online reporting system operated by NAVEX and provided by Bread Financial to allow you to ask questions and report incidents. Use of the Ethics Helpline is entirely voluntary. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we might have. Please note that the data privacy laws of some countries limit the types of reports that may be accepted through the Ethics Helpline. If your concern pertains to issues not listed, you are encouraged to report your concern through one of the channels listed above.

Any information you provide about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct. You will not be subject to retaliation or reprisal from Bread Financial for submitting information in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

What information is collected? The Ethics Helpline captures the following information directly from you: your name and contact details (unless you report anonymously), any question you may have, the name and/or title of individuals you may be reporting, and a description of any questionable conduct, including relevant details.

For which purpose is your personal data being processed? Alliance Data collects and processes your personal data (unless you report anonymously) to enable Alliance Data to conduct an investigation regarding the reported ethical issues or potential violations described in your report (the "**Purpose**").

On which legal ground does Alliance Data base the processing of your personal data? Bread Financial's processing of your personal data associated with the Ethics Helpline can be based on the following legal grounds:

1. **Consent.** You may freely consent to the processing of your personal data based on the specific information provided in this Data Privacy Notice. Note that you can always withdraw your consent as set forth below under the caption "Can you withdraw your consent?";
2. **Legitimate interests pursued by Bread Financial.** The processing of your personal data is necessary to allow you to ask questions and/or report ethics incidents;
3. **Performance of a (service) contract.** If you decide to use the Ethics Helpline, you agree to the terms of use and therefore you enter into a binding agreement between you and Bread Financial; or
4. **Compliance with a legal obligation.** Bread Financial may process your personal data when necessary to comply with tax or legal obligations, occupational health and safety requirements, and/or fraud investigations.

Depending on where you reside, these legal grounds may be described in slightly varying terms based on local law.

How will the information be used? All the information will be stored on the Ethics Helpline database hosted by NAVEX. Unless otherwise required by law, the information in the Ethics Helpline database may only be reviewed and used by those individuals who need to access the data to fulfill the Purpose. These individuals may include appropriate personnel of Bread Financial, including human resources, finance, audit, legal, security, management or external advisors (*i.e.*, legal advisors), or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located in the United States or elsewhere. In addition, all information you provide may be stored by Bread Financial in the course of answering your question(s) or investigating the report.

Bread Financial will evaluate the information you provide, and may conduct appropriate investigations and take corrective action. Please note that because of applicable laws, individuals you identify through the Ethics Helpline may be informed of the fact that a report has been made. However, the information you provide will not reveal your name or identity. In addition, all such individuals you identify will have the right to respond to or correct information you reported.

How long is your personal data retained? Any information you submit that is not needed to answer your question or for the investigation of any incident will be deleted or archived, in accordance with local law. In addition, once we have responded to your question or completed any investigation, all information you submitted will be deleted or archived, as appropriate and in accordance with local law. Bread Financial will take adequate technical, organizational, and legal steps to secure the information you provide. Bread Financial also requires NAVEX to adequately secure your personal data and not use it for any unauthorized purposes.

How can you exercise your privacy rights? You can request to access, rectify or erase your personal data at any time. Further, in certain cases you also may have the right to restrict processing of your personal data, the right to object to processing, as well as the right to data portability. Please contact privacy@breadfinancial.com.

Can you withdraw your consent? Once given, you may always withdraw your consent by contacting privacy@breadfinancial.com. Please keep in mind that withdrawal does not have retrospective effect.

Can you lodge a complaint? Where applicable under local law, you can lodge a complaint with your local data protection supervisory authority or commissioner when you have a complaint about the use of your personal data by Bread Financial.

Do we use profiling techniques or make automated decisions? We do not use profiling techniques and/or any kind of automated decision-making in connection with the Purpose.

Who should I contact in case of any questions? If you have any questions about the way we process your personal data after reading this Data Privacy Notice, please contact privacy@breadfinancial.com.