

THE MICHAELS COMPANIES 2022

Data Privacy and Security Policy

THE MICHAELS COMPANIES, INC.

Data Privacy and Security Policy

statement ?

The Michaels Companies (the "Company" or "Michaels") has adopted this policy, which lays out the Company's approach to developing, sourcing, and delivering products responsibly and thoughtfully. This policy statement applies to all Michaels employees and customers, and it is approved by senior management and the Board of Directors.

User Privacy \$

Our <u>Privacy Rights webpage</u> provides transparency around our collection, processing, and sharing of personal information, including information relating to behavioral advertising, user privacy, and individual data control rights.

We treat our customers with the highest bar of data privacy; all the rights and requests of CCPA (California Consumer Privacy Act) are afforded to our customers, when possible, regardless of their location. We also follow, track, and adhere to China PIPL (Personal Information Protection Laws) for our Chinese employees.

We use technical, administrative, and procedural measures to safeguard personal and other information from unauthorized access or use. However, no such measure is ever 100% effective, and we do not guarantee that personal and other information will be secure from theft, loss, or unauthorized access or use. We do not represent the reasonableness, efficacy, or appropriateness of the measures we use to safeguard such information.

Data Privacy and Security Oversight?

Our Data Privacy and Security Risk Management is a joint effort between our Chief Information Officer, Chief Legal Officer, and their respective teams. In addition, we have dedicated compliance directors that track developing trends and meet routinely to discuss emerging issues or initiatives. These compliance directors also meet with third-party privacy advisors for a similar purpose.

In addition, our Board receives annual state of security and privacy updates and manages and oversees risks related to data privacy and security. During annual meetings, the audit committee, CISO, and CIO are responsible for answering the Board's cybersecurity-related questions.

If you have security-related concerns, we invite you to contact Michaels directly.

Contact Us by Mail: Michaels Stores, Inc. Attn: Customer Service 3939 West John Carpenter Freeway. Irving, TX 75063 Contact Us by Phone: 1-800-MICHAELS (1-800-642-4235)

Monday - Friday: 8 AM to 7 PM CST

Saturday: 9 AM to 6 PM CST

Employee Policies and Training ?

All Michaels' associates participate in an annual security awareness training program that involves data privacy, data protection, and cyber awareness. In addition, a similar program exists within our new hire training program.

All Michaels' team members must partake in an ethics education and training program that addresses data ethics. In addition, as a team, we regularly conduct phishing and awareness campaigns.

We also use a data privacy program that entails investigation, identification, classification, and data protection.