

SOCIAL SECURITY NUMBER & PERSONAL INFORMATION PRIVACY POLICY

ANN INC. is dedicated to protecting the personal security and privacy of all associates and clients. In the ordinary course of its business, and for a variety of legitimate business reasons, the Company may collect and store personal information about its associates and clients, including but not limited to social security numbers ("SSN"), in hard copy or digital storage.

The Company takes measures to prevent the unauthorized disclosure of SSNs, including without limitation:

- Protecting the confidentiality of SSNs;
- Prohibiting unlawful or unauthorized disclosure of SSNs;
- Limiting the number of people with access to SSNs;
- Properly disposing of documents (hard copy or digital) that contain SSNs; and
- Disciplining any associate who violates this policy.

The Company and its associates with access to SSNs, will maintain the security and confidentiality of every document containing the SSN. This means that the Company's Human Resources Department will maintain all associate files containing SSNs under lock, and that any access to digital files containing all or any part of an associate or client SSN will be password protected.

Furthermore, except as otherwise required under Company processes, no associate shall display or disclose an associate or client SSN. The Company will not mail any document containing a SSN that is visible on, or from, the outside of the mailed article. Nor will the Company use the SSN as a general identifying number for its associates, or visibly print it on identification tags, badges, passes, cards or licenses. The Company will not require associates to use or transmit their SSN over the Internet, or any Company intranet, computer system, or network unless the connection is secure or the transmission is encrypted.

The Company restricts access to any document displaying a SSN to those with a legitimate business need to access those documents who are acting consistent with Company policy and in accordance with their assigned job tasks. Access to these documents by anyone other than those authorized under Company policy must be specifically authorized, in writing, by the Executive Vice President of Human Resources or by the associate to whom the SSN is assigned. Documents containing a SSN will be disposed of in a manner that maintains their confidentiality.

The Company shall not communicate an associate's personal information to the general public. "Personal information" shall include SSN, home address or telephone number, personal electronic mail address, Internet identification name or password, last name prior to marriage, or drivers' license number.

Nothing in this policy is intended to modify an associate's right to access their own personnel file, as permitted by the Company's policies and state law. Nor does this policy prohibit the use of an associate's or client's SSN or personal information where the use is authorized or required by state or federal statute, rule, regulation, court order, or pursuant to legal discovery or process.

Violations of this policy will result in disciplinary action up to and including termination of employment. Violators may also be subject to civil and criminal penalties authorized by applicable state or federal law.