

FOOT LOCKER, INC. PRIVACY POLICY

Introduction

Foot Locker, Inc. a corporation organized under the laws of the state of New York, United States of America, and its U.S. subsidiaries (the "Company"), is committed to maintaining an environment that is free of discrimination based on race, color, religion, sex, age, sexual orientation, national origin, disability or other factors that are unrelated to the Company's legitimate business interests. It is our policy to apply fair and lawful human resource policies and practices in all aspects of employment, including recruiting, hiring, evaluation, training, discipline, career development, compensation, promotion and termination. The Company respects and is committed to protecting the personal information of its associates, customers, suppliers and business partners.

Effective July 9, 2002, the Company began to centralize the human resources and compensation information for associates of the Company and its subsidiaries and affiliates worldwide on the PeopleSoft Human Resources Management System. More recently, individuals who are interested in seeking employment with the Company's European subsidiaries and affiliates ("Foot Locker Europe") may visit the career site on Foot Locker Europe's website and apply for a position with Foot Locker Europe directly through this site. As a result, the Company receives personal data on associates and applicants from Foot Locker Europe.

Effective in August 2008, Foot Locker Europe's UK-based website became operational, with websites in other European countries expected to follow, and information regarding customers who place orders through this website may be received by the Company. Foot Locker Europe also operates a paneuropean marketing website where visitors can subscribe to newsletters and participate in various marketing initiatives.

The European Commission's Directive on Data Protection covers the transfer of personal data to non-European Union nations providing adequate protection of the information. The United States Department of Commerce has developed a "safe harbor" framework to provide a method for United States organizations to comply with the European Commission's Directive. The Company is in compliance with this safe harbor.

This Privacy Policy sets out the Company's policies with respect to the collection and use of personal information sent to the Company in the United States regarding associates of Foot Locker Europe and applicants, visitors, and customers of its websites based in Europe.

Treatment and Use of Information

The Company's policy is to treat all individually identifiable personal data of associates employed by the Company or its subsidiaries or affiliates -- and applicants seeking employment through Foot Locker Europe's website -- with great care in order to safeguard the privacy of its associates. Personal data concerning associates that is

transmitted from Foot Locker Europe to the United States to the Company's Corporate Human Resources Department, as well as to its Finance and Information Technology Departments, shall be used solely in connection with an associate's employment in accordance with the Company's human resource policies and practices and in connection with the administration of the Company's compensation, benefits, and human resources programs. Personal data concerning applicants obtained through Foot Locker Europe's website is initially transmitted to the Company's computer server in the United States and then directed to the appropriate HR director or recruiter, who may be in Europe or the United States, depending upon the location of the position for which the applicant is applying.

Customer information obtained from customers who order through Foot Locker Europe's websites or by participating in marketing initiatives and subscribing to newsletters is used to (i) process orders, (ii) communicate with customers regarding their orders, and (iii) communicate with customers regarding relevant promotions, competitions, marketing initiatives, merchandise releases, and offers or other relevant information. The information may also be used for statistical purposes. Only certain associates in the following departments within the Company will have access to customer information: Accounting and Financial Reporting, Information Technology, Marketing, and Footlocker.com/Eastbay and its customer service call centers.

Safe Harbor Principles

1. *Notice.* From time to time, the Company may provide information about associates to third parties for purposes related solely to the associates' employment or the administration of the Company's compensation, benefits, and human resources programs. The Company may also provide information about customers to third parties for purposes solely related to processing orders and payments, and notifying customers of upcoming promotions, marketing initiatives, merchandise releases and other relevant information. Examples of the types of third parties to which the Company may disclose personal information are: (A) with regard to associates: compensation and benefits consultants, internal and external auditors of the Company, and tax professionals retained by the Company, and (B) with regard to customers: shipping carriers, customer service call centers, payment clearance companies, and the companies retained by the Company to provide website development support. Prior to disclosure of personal information about associates or customers to any third party, the Company will confirm that the third party is subject to EU regulation or subscribes to the safe harbor principles or, alternatively, that the third party will provide at least the same level of privacy protection required by the safe harbor principles. The Company may also disclose associates' or customers' personal information when required by law or legal process.

2. *Choice.* The Company does not intend to use or share personal information with third parties for purposes that would be incompatible with the purposes for which the information was originally collected or consented to by the associate or customer ("Incompatible Data Uses"). To the limited extent that any "sensitive information" (such as data containing personal information about racial or ethnic origin, political opinions, trade-union membership, medical records, or criminal records) needs

to be collected, the Company shall ensure that the individual is informed of such collection and processing. Where required by law, the person's explicit consent to the processing and particularly to the transfer of such data to non-European entities will be obtained.

3. *Onward Transfer.* Prior to disclosure of personal information about associates or customers to any third party, the Company will confirm that the third party is subject to EU regulation or subscribes to the safe harbor principles or, alternatively, that the third party will provide at least the same level of privacy protection required by the safe harbor principles.

4. *Access.* We limit access to personal information to those associates who need to know that information in order to perform their duties for the Company. Authorized associates are designated by a Corporate Senior Vice President, the Chief Financial Officer, or a Vice President at Foot Locker Europe or Footlocker.com. Associates who have access to personal information are required to sign-off on and to abide by the Company's policies on the treatment of confidential information set out in the Company's Code of Business Conduct and Confidential Information Policy and to receive training on European data protection requirements. European associates will moreover sign off on the Foot Locker Europe Data Protection Policy.

5. *Security of Information.* Personal information security is one of the Company's highest priorities. Personal information, including payroll information and taxpayer identifying information, is considered Highly Confidential under the Company's Confidential Information Policy and is subject to the strictest procedures for access, distribution and destruction. In addition to the Confidential Information Policy, we emphasize this priority in the Company's Code of Business Conduct that is distributed at least annually to associates. Associates who violate our policies may be subject to disciplinary action. The Company regularly assesses its information security standards and procedures to protect against any unauthorized access to, or any unauthorized alteration or destruction of, the information on the PeopleSoft Human Resources Management System.

The Company also has security measures in place to protect customers against the loss, misuse or alteration of the information they provide to Foot Locker Europe when placing orders on its website or subscribing to newsletters and participating in marketing initiatives. Foot Locker Europe encrypts certain personal information, including credit card numbers, when transmitting information over the Internet. Foot Locker Europe also maintains and follows a website privacy policy with regard to information provided by customers on its website.

6. *Data Integrity.* The Company believes that the personal information that it collects and maintains about associates is relevant because the information directly relates to associates' employment, as well as to the Company's compensation, benefits, and human resources programs. The information collected from applicants seeking employment is relevant because it is necessary in determining the applicant's

qualifications for employment with the Company. The information collected from customers is relevant because it is fundamental to processing orders placed by the customer.

The Company believes that the data contained and retrieved from its computer systems is reliable for its intended use by the Company.

7. *Enforcement.* The Company agrees to cooperate with the Data Protection Authorities located in the European Union member states in resolving any individual complaints or disputes with regard to this policy and the European Commission's Directive on Data Protection.

Questions or Complaints

For questions or complaints regarding this policy, please contact Cathy Wilson, VP - Human Resources or Rita Schroeven – VP Legal at Foot Locker Europe in Vianen, The Netherlands (telephone: 31-3478-05091; e-mail: cwilson@footlocker.com), Laurie Petrucci, Senior Vice President - Human Resources of the Company in the New York Office (telephone: 212-720-4403; e-mail: lpetrucci@footlocker.com), or Carrie Madson, Vice President – Human Resources of Footlocker.com (telephone: 715-261-9580; e-mail: cmadson@footlocker.com). All complaints will be investigated.

Amendment or Termination of Policy

The Company reserves the right to amend, terminate or suspend this Privacy Policy at any time. Any changes shall be communicated to associates in a timely manner.