

# **Applicant Privacy Statement**

May 2025



#### Our commitment to You

Santander Consumer Bank ("Santander", the "Bank", "us", "we", "our") is committed to upholding privacy rights and adhering to the fair information principles outlined in the <u>Personal Information</u> <u>Protection and Electronic Documents Act (PIPEDA)</u>. This Applicant Privacy Policy ("the Policy") articulates Santander's commitment to how we respect and value your privacy throughout the recruitment process; Informing you of the practices that we have in place for the collection, use, disclosure, and retention of your Personal Information, along with your rights to access your Personal Information.

The Bank may update this Policy from time to time to ensure it accurately reflects our current practices. If we make a change to this Policy, we will post the revised Policy on our website and make it available to you upon your request.

#### Applicability

The Policy applies to any internal or external applicant, who applies for a role or submits their Personal Information to the Bank's Human Resources Department, expressing interest in working at the Bank.

#### Definitions

**Personal Information** - information about an identifiable individual. As it relates to recruitment, this can include information such as:

- Contact information, name, nationality, age and marital status.
- Financial information, credit records, unique identification numbers (e.g., Social Insurance Number)
- Biometric information, photographs, and signatures
- Employment history, qualifications, skills and experience where it is accompanied by other personal identifiers such as names.

# Why do we collect information?

We collect your information to assess your suitability for employment and verification purposes.

#### What information do we collect?

We collect a range of information from you during the recruitment process, which may include, but not necessarily be limited to the information defined above. We may collect the following information from you:

• Name, contact information, and other identifiers: This includes information such as your real name, alias, postal address, unique personal identifier, telephone number, online identifier, IP address, email address, social security number (or equivalent), driver's license.



- Protected Classifications: Characteristics that fall under protected classifications, including gender, color, sex, age, religion, national origin, disability, citizenship status.
- Employment History: Details about your professional or employment-related background (including your resume/CV or cover letter and references), responses to application questions, and applicable right to work, background, or criminal convictions verification information.
- Education Information: Information pertaining to your educational history or qualifications.

# \*In Canada, self-identifying your gender and marital status is optional

The information we collect is limited to only what is necessary for the purposes identified by us or permitted by law and which is collected.

# Show do we collect information?

We collect information directly from you (e.g., submitted applications, resumes and cover letters; meetings and interviews held with you); and from third parties that you have agreed can share your Personal Information with us (such as external recruiting firms, recruitment websites, professional sites).

# With whom may we share your information?

If applicable, your Personal Information may be shared, stored, or accessed with our parent and foreign affiliated companies in order to meet recruitment requirements. The information shared with the Bank's parent and foreign affiliated companies is subject to the privacy policies of those entities, and the applicable laws and regulations of the countries where they are located. We may also share your personal information with our Third-Party Service Providers, the Bank has contracted with to provide services on our behalf, to manage our relationship with you. By providing your Personal Information, you acknowledge that such transfers, storage, or processing may occur.

Some of the specific ways we collect, use and share information within the Bank or with the Bank's Foreign Affiliates or other third parties include:

- with your consent;
- to comply with valid legal processes such as search warrants, subpoenas, court orders, or other demand or request;
- to meet requests for information from regulators, including self-regulatory organizations of which we are a member or participant;
- to assist law enforcement investigations or to share information with government agencies
- during emergency situations or where necessary to protect the safety of a person or group of persons;



- to satisfy legal and regulatory requirements applicable to us;
- to third parties the Bank has contracted with to perform services on our behalf, to manage our relationship with you;
- sharing it with credit reporting agencies and background check agencies to verify your credit reference and criminal records; or
- where permitted by applicable law;

Personal Information will not be disclosed for purposes other than those for which it was collected, except when you have otherwise consented, or as required or permitted by law. The Bank may engage third parties for all or part of the recruitment process.

# How do we retain your information?

Personal Information is retained in accordance with our records' retention and destruction policy and procedure. Santander only retains information for as long as necessary to fulfil the purposes of the initial collection and to satisfy legal requirements. All candidate information is retained on file for consideration for future employment opportunities; see below how you can opt out.

If you receive and accept an offer of employment with Santander, the Personal Information collected during the pre-employment process will become part of your employment records. This information will be retained during your employment and for a specified period afterward, in accordance with applicable internal policies and procedures.

If Santander doesn't hire you, we may retain and use the Personal Information collected to consider you for future opportunities or to reference a previous application if you apply again. You may request the removal of your applicant data from our system at any time after a decision has been made regarding your initial application.

# Your privacy rights

# Your consent

We obtain your consent for the practices and policies outlined in this Policy when you apply for employment. Additionally, we seek your consent for any new collection, use, or disclosure of Personal Information when required.

# Accuracy of your personal information



Our business decisions rely on the accuracy of the information we hold about you. It is your responsibility to ensure the information you provide is accurate and up to date. You also have the right to notify us of any changes to your information so it can be updated appropriately.

#### Accountability and safeguards

Santander has a Chief Privacy Officer responsible for overseeing the organization's privacy management program, which includes establishing policies, procedures, and monitoring their effectiveness. Santander implements administrative, physical, and technological safeguards to protect your Personal Information from unauthorized access, use, alteration and disclosure.

#### **Employee education and ethical conduct**

All new employees are required to complete privacy training during onboarding and participate in ongoing training throughout their employment. Employees are expected to respect and protect any personal information they may access. We use technology to support our people and processes but do not rely exclusively on fully automated tools to make decisions about individuals based on personal information. Human oversight and accountability procedures are in place for all technology used.

#### Accessing your information

Santander is committed to providing individuals, upon request, with information about the existence, use, and disclosure of their personal information. This commitment includes granting access to personal information, allowing individuals to review and verify the accuracy and completeness of the data held by us.

You can ask to see the Personal Information that we hold about you, or to make any corrections to that information. If you want to review, verify or correct your Personal Information, please contact our Chief Privacy Officer using the contact information set out below. Please note that such communication must be in writing.

# **Contact information**

For questions or concerns about this Privacy Policy, our privacy practices, or if you would like to review your personal information, please contact our Privacy Office at:

Chief Privacy Officer Santander Consumer Bank #200, 4245 - 97 Street NW, Edmonton, AB Phone: 1-888-486-4356



Fax: 1-888-486-7456 Email: <u>privacyofficer@santanderconsumer.ca</u>