

Citizens Financial Group, Inc. Job Applicant Data Privacy Policy

Effective Date: June 28, 2024

Your privacy is important to us. This Job Applicant Data Privacy Policy (“Policy”) describes how Citizens and its family of companies collect, use, and share the personal information of job applicants during the recruitment process. This Policy applies to the information we collect through our websites as well as information submitted to us from candidates (internal and external) who express an interest in working for Citizens or apply for a role. We use the term “personal information” to describe information that can be associated with you and can be used to identify you. Personal information does not include information that does not identify a specific person or that is publicly available.

Citizens refers to Citizens Financial Group, Inc., and its family of companies, including Citizens Bank N.A., Investors Bank, a division of Citizens Bank, N.A., Citizens Securities, Inc., Clarfeld Financial Advisors, LLC, Estate Preservation Services, LLC, College Raptor, Inc. and other banks or companies that may be acquired or established from time to time. Those companies may also conduct business under brand names including Citizens Access and Clarfeld Citizens Privacy Wealth.

This Policy supplements the Citizens Online Privacy Policy. Additional information regarding Citizens’ privacy practices can be found here: [Privacy Policy | Citizens \(citizensbank.com\)](https://citizensbank.com/privacy-policy). If you are job applicant, and also a California resident, you may have rights under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively the “CCPA”). Please see our CCPA Policy and Notice below.

Categories of Personal Information We Collect

As permitted by applicable law, we may collect the following categories of personal information for the purposes described below:

- Personal identifiers, such as your name, preferred name, postal address, telephone number, online identifier (i.e., social media handles), email address, Social Security number, driver’s license number, passport number, date of birth, signature, state identification card number and employee number where currently employed by Citizens.
- We may collect fingerprints for the purposes of performing a background check as permitted by applicable law.
- Professional or employment-related information, such as your job application or resume, employment history, employment contract, references, information about skills and abilities, accomplishments and awards, training and development information, type of employment sought or other job preferences, including how you heard about the position.
- Non-public education information, such as your education history, education records (such as grades, transcripts, and class lists) and other information included in your resume or cover letter.
- Internet, device or electronic network activity information such as: Internet Protocol (IP) address and/or domain; type and version of Internet browser software and operating system you use; date, time, and duration of your website access; browsing and search history, to include specific pages, mouse movements, scrolling, mouse clicks and keystrokes, buttons, images, videos, links, or forms that you access while visiting the website; interactions with websites and advertisements; type of device (e.g. iPad, iPhone, Android); mobile carrier and/or Internet Service Provider; country of origin of your computer and the language(s) used by it.

- We also may collect personal information included in job interview notes, responses to screening questions, assessment results and any other information you provide in connection with the recruitment process.

Sources of Personal Information

We collect personal information you voluntarily provide to us when you apply to Citizens or when you otherwise contact us.

We may also collect information about you from other sources, such as:

- Recruiters.
- Prior employers and professional references.
- Educational institutions.
- Pre-employment screening and background check services.
- Credentialing and licensing organizations.
- Publicly available sources, such as public social media profiles on LinkedIn, Twitter or Facebook.
- Your devices, such as when you visit our website.
- Other sources as directed by you.

Business Purposes for Collecting Personal Information

We use the categories of personal information above for the following business purposes:

- To assess your skills, qualifications, and interests against our career opportunities.
- To conduct background checks if you are offered a job.
- To communicate with you and inform you of career opportunities.
- To create and submit reports as required by law or regulation.
- To improve our recruitment process.
- To generally administer your employment.
- To learn how the application and recruitment process impacts any customer relationships with any applicant.
- To comply with applicable law.

Disclosure of Personal Information

We may disclose your personal information for the business purposes described in this Policy with the following parties:

- **Affiliates and Subsidiaries:** We may disclose your personal information with our affiliates and subsidiaries.
- **Service Providers:** We may disclose your personal information with service providers, such as recruiters, pre-employment screening services, background check providers and others.
- **Governmental Authorities:** As required by law or legal process, we may disclose your personal information with federal or state regulatory agencies, law enforcement, courts, and other governmental authorities.
- **Professional Advisors:** We may disclose your personal information with our professional advisors, such as auditors and law firms.
- **Parties Involved with Business Transfers:** We may disclose your personal information to third parties in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution, or liquidation).

Cookies

Cookies are small text files that are placed on your computer. The use of cookies helps us to improve your experience on our websites by providing data on our website’s features. The use of cookies is a standard practice. Depending on the website you are visiting, we or our third-party service providers may place cookies or similar files on your hard drive. Certain web browsers can inform you every time a cookie is being sent to you and certain web browsers allow you to choose not to accept cookies. You can also delete cookies from your computer at any time. If you refuse cookies, the functionality of our website may be impacted or become non-functional. Since every browser and computer is different, you will need to follow your browser’s instructions for disabling or deleting cookies.

Cookie Type	Description
Essential Cookies	These are cookies that our websites need in order to function, and that enable you to move around and use the websites and features. Without these essential cookies, our websites will not perform as smoothly for you as we would like them to and we may not be able to provide the websites or certain services or features you request. Examples of where these cookies are used include to determine when you are signed in, to determine when your account has been inactive, and for other troubleshooting and security purposes.
Analytics Cookies	Analytics cookies allow us to understand more about how many visitors we have to our websites, record how they interact with our websites, how many times they visit us, and how many times a user viewed specific pages within our websites. Although analytics cookies allow us to gather specific information about the pages that you visit and whether you have visited our services multiple times, we cannot use them to find out details such as your name or address. We use Google Analytics in addition to session replay technology. For more information about Google Analytics, please refer to “How Google Uses Information From Sites or Apps that Use Our Services,” which can be found at www.google.com/policies/privacy/partners/ , or any other URL Google may provide from time to time.

How Citizens Retains Your Data

The length of time that we intend to retain your personal information will depend on a number of criteria, including (i) the length of time we are required to retain personal information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain personal information in order to accomplish the business purpose(s) for which such personal information is collected, used or disclosed (as indicated in this Policy), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your personal information. Personal information is retained in accordance with local law. We may also retain your personal information to consider you for other jobs for which you may be qualified.

If you accept employment with us, the information collected will become part of your employment record and will be used for employment purposes or otherwise as required or as permitted by law.

Protection of Your Personal Information

We take our responsibility to protect your information very seriously. We use commercially reasonable physical, technical, and procedural safeguards to secure your information from unauthorized use, access, alteration, or disclosure. However, the confidentiality of information transmitted over the internet cannot be guaranteed. Please only submit personal information to Citizens through secure channels such as online applications, over the phone, or as otherwise directed by a Citizens representative. Please be advised Citizens will never ask for you to send personal or

financial information by, in response to, or via a link in an email or text. Do not provide sensitive personal information, such as your social security number or account number, in public forums, such as social media websites. Please carefully review the Terms of Use and Privacy Policies on these social media and other sites as they may be different than our own policies.

Please see our [Security](#) section for additional information.

Changes to This Policy

Please note that we will periodically make changes to this Policy. It is your responsibility to review this Policy frequently and remain informed about any changes to it, so we encourage you to visit this page often. Your continued use of our applicant services constitutes your acceptance of any amendments to and the most recent versions of this Policy.

California Consumer Privacy Act Notice

California residents have certain rights with respect to their personal information as described below. We have provided detailed descriptions about your personal information above in the “Categories of Personal Information We Collect,” “Sources of Personal Information,” “Business Purposes for Collection,” and “Disclosure of Personal Information.” Under the CCPA, applicants who are residents of the State of California maintain the following rights:

- **Right to Know and Access.** The right to know and understand the categories of personal information we collect about you, the categories of sources from which the information was collected and the purposes for collecting, using, and disclosing such personal information. Consistent with applicable law, once verified, you will receive a portable copy of any personal information Citizens has collected on you during the 12 months immediately preceding your request. You may submit a request no more than two times in a twelve-month period, beginning upon the submission of your first request.
- **Right To Correct Inaccurate Personal Information.** The right to submit a request to correct personal information held by Citizens. Consistent with applicable law, we will correct your information upon request unless an exception applies.
- **Right to Request Deletion of Personal Information.** The right to submit a request to delete personal information held by Citizens. Consistent with applicable law, we will delete your information upon request.
- **Right to Opt-Out of the Selling of Personal Information or Sharing of Personal Information for Cross-Context Behavioral Advertising.** Citizens does not sell or share applicant personal information.
- **Automated Processing.** Under certain circumstances, you have the right to object to a significant decision based solely on automated processing (i.e., without human intervention) unless that decision is required or authorized by law.
- **Right to Opt Out of our Use of your Sensitive Personal Information (in certain instances and if permissible under applicable law).** We do not disclose sensitive personal information for purposes other than those which cannot be limited under applicable law.

We will not discriminate or retaliate against you if you choose to exercise any of your rights under the CCPA.

How to Exercise Your Rights

In order to exercise your rights described above, please navigate to our online web portal available at [CCPA Privacy Rights Portal](#) or by calling us at 1.888.999.1927.

Please also note that prior to processing your request and to protect your personal information, Citizens will perform reasonable processes to verify your identity, which will require you to provide certain information for us to confirm against independent sources.

To authorize an agent to exercise your privacy rights on your behalf, your authorized agent can submit a request by calling 1-888-999-1927. We may require proof from your authorized agent, such as a Power of Attorney and other information for verification of identity.

Contact Information

If you have any questions or concerns regarding your rights, call us at 1-888-999-1927.