

## SANTANDER HOLDINGS USA, INC. EMPLOYEE PRIVACY NOTICE

**Santander Holdings USA, Inc. its subsidiaries or affiliates (collectively, “Santander”) respects your concerns about privacy. This Employee Privacy Notice (“Privacy Notice”) outlines the types of personal information that Santander collects from (1) Santander’s employees and people who apply to work at Santander; and (2) individuals related to Santander’s employees and for whom Santander administers benefits. This Privacy Notice also outlines how that information is used by Santander, and for what purpose.**

### **Compliance with Local Laws**

This Privacy Notice is a general guide to how Santander treats employee and employee applicant personal data. It also states the rights afforded solely to residents of the State of California under the California Consumer Privacy Act (“CCPA”).

You should be aware that data privacy laws can vary in different jurisdictions where Santander operates and has employees. Santander’s policy is to comply with local laws and in some cases, obtain consent to those practices.

### **Information Santander Collects and How It Uses the Information**

Over the past twelve (12) months, Santander has collected, and may continue to collect, the following categories of personal information for the purpose of carrying out and supporting human resources functions and activities, including the specific uses set forth in the chart below. Santander’s use of personal information is described in further detail below the summary table:

CATEGORIES OF PERSONAL INFORMATION OBTAINED	SANTANDER’S USE OF PERSONAL INFORMATION
Contact information, including your name, work, and personal contact details (including postal addresses, phone numbers, fax numbers and email addresses), and emergency contact information	<ul style="list-style-type: none"> <li>➤ Managing workforce</li> <li>➤ Operating facilities and preparing for and responding to emergencies</li> <li>➤ Conducting business operations</li> <li>➤ Satisfying legal and compliance obligations</li> </ul>
Demographic and family information, including age, date of birth, race, gender, sex, religion, ethnicity, nationality, place of birth, citizenship status, disability, military and veteran status, marital status, unique pseudonym, and dependent information including dependent’s date of birth, name, gender, relationship to employee, disability, and social security number	<ul style="list-style-type: none"> <li>➤ Managing workforce</li> <li>➤ Satisfying legal and compliance obligations</li> </ul>

Identification information, including Social Security number, driver's license or state identification card number, passport number, employee ID number, copy of signature, account name, CCTV footage, and photographs	<ul style="list-style-type: none"> <li>➤ Managing workforce</li> <li>➤ Operating facilities and preparing for and responding to emergencies</li> <li>➤ Conducting business operations</li> <li>➤ Satisfying legal and compliance obligations</li> </ul>
Compensation, benefits, and payroll information, including bank account details, credit card number, salary-related information including exempt or non-exempt status, equity awards, tax-related information, benefits elections, dependent information, health insurance information, insurance policy number, details regarding leaves of absence, and injuries or other medical issues	<ul style="list-style-type: none"> <li>➤ Managing workforce</li> <li>➤ Conducting business operations</li> <li>➤ Satisfying legal and compliance obligations</li> </ul>
Information relating to your position, including job title, job description, training, performance management information (e.g., evaluations, offer letter), information regarding immigration status and eligibility for work, office location, officer title, dates of employment and general location data regarding corporate travel destinations, termination reason (if applicable)	<ul style="list-style-type: none"> <li>➤ Managing workforce</li> <li>➤ Operating facilities and preparing for and responding to emergencies</li> <li>➤ Conducting business operations</li> <li>➤ Satisfying legal and compliance obligations</li> </ul>
Talent management information, including resume information, occupation details, education details, certifications and professional associations, historical compensation details, performance reviews and ratings, performance warnings, previous employment details, and pre-employment screening and background check information, including criminal records information and reference letters from candidates	<ul style="list-style-type: none"> <li>➤ Managing workforce</li> <li>➤ Satisfying legal and compliance obligations</li> <li>➤ Conducting business operations</li> </ul>
Information about your use of Santander's IT resources, including assigned equipment, IP address, user ID, online identifiers, the time and duration of internet and network connections and how you use technology resources, including emails you send/receive, websites browsing history, internet search history, software, and files you download and voicemails you receive, information on your interaction with our website.	<ul style="list-style-type: none"> <li>➤ Conducting business operations</li> <li>➤ Satisfying legal and compliance obligations</li> </ul>

We obtain the categories of personal information listed above from the following categories of sources:

- Directly and indirectly from our employees, whose information is entered into the Human Capital Management system.

- Directly and indirectly from activity on our career website ([www.santandercareers.com](http://www.santandercareers.com)). For example, from submissions through our website or website usage details collected automatically.

#### **Further Detail About Santander Uses of Personal Information**

As indicated in the table above, Santander may use personal information for one or more of the following business purposes, depending on the category of personal information involved. Santander has provided further detail regarding each of these uses below:

- **Managing the workforce:** Santander uses, and may continue to use, your personal information for a variety of reasons related to the management of its workforce, compensation and benefits, and other HR-related purposes. This includes managing work activities and personnel generally, including recruiting; performing background checks; determining suitability for employment or promotion; determining physical and/or mental fitness for work; accommodating a disability or illness; establishing fitness to work; reviewing and evaluating performance; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; managing attendance, absences, leaves of absences, and vacations; administering payroll services; reimbursing expenses; administering health and other benefits; providing and managing company cards and fuel cards where applicable; training and development; making travel arrangements; securing immigration status; monitoring staff; creating staff directories; investigating suspected misconduct or non-performance of duties; managing disciplinary matters, grievances, and terminations; reporting; reviewing staffing decisions; administering, organizing, and arranging participation in Santander sponsored events or programs; providing access to facilities. The personal information (from the categories in the chart above) that Group can utilize in Workday for the purposes of certain Global HR & Organization purposes is based upon the Data Sharing Agreement that Santander entered into with Banco Santander, S.A.
- **Operating facilities and preparing for and responding to emergencies:** Santander uses, and may continue to use, your personal information to ensure that Santander's facilities and infrastructure are used properly, and to prepare for and manage emergency situations. This includes ensuring business continuity; protecting the health and safety of staff and others; safeguarding, monitoring, and maintaining IT infrastructure, office equipment, facilities, and other property; detecting or preventing theft or fraud, or attempted theft or fraud; and facilitating communication with you and your designated contacts in an emergency.
- **Conducting business operations:** Santander uses, and may continue to use, your personal information to effectively operate its business functions. This includes operating and managing IT, communications systems and facilities, and monitoring the use of these resources; performing data analytics; improving services; allocating and managing company assets and human resources; making insurance claims; strategic planning; project management; compiling audit trails and other reporting tools; maintaining records relating to business activities, budgeting, and financial management; and managing mergers, acquisitions, sales, reorganizations or disposals and integration with purchasers.
- **Satisfying legal and compliance obligations:** Santander uses, and may continue to use, your personal information to ensure that Santander is compliant with its legal and regulatory obligations. This includes complying with legal

requirements, such as tax, record-keeping, and reporting obligations; conducting audits, management and resolution of health and safety matters; complying with requests from government or other public authorities; responding to legal process such as subpoenas and court orders; pursuing legal rights and remedies; defending litigation and managing internal complaints or claims; conducting investigations; and complying with internal policies and procedures.

- **Sharing with third parties to benefit Santander employees:** Santander may disclose your personal information to a third party for a business-related purpose. This includes providing information to Santander's affiliates, service providers, healthcare providers, and financial institutions for services such as health insurance, vision and dental insurance and retirement planning. Santander also may disclose your personal information to a third-party to provide you with a discount or other benefit. *In the past twelve (12) months, Santander has shared information about Santander Consumer USA employees with Chrysler Financial to facilitate special discounts and offers for Santander Consumer employees.*
- **Categories of Personal Information shared with Third-Party for Cross-Context Behavioral Advertising:** Santander may disclose information on your interaction with our website.

### Your Rights

You are not required to do anything or take any action at this time.

Based on the jurisdiction you reside in and the laws governing personal information in your jurisdiction, you may have rights related to your personal information, such as access, rectification, and deletion.

California Residents Rights under CCPA:

If you are a California resident, you are entitled to the following rights under CCPA:

1. **Right to Know About Your Personal Information:** You have the right to request that we disclose to you what personal information we collect, use, and disclose to third parties as follows:
  - The categories of personal information we collected about you.
  - The categories of sources for the personal information we collected about you.
  - Our business or commercial purpose for collecting or sharing that personal information.
  - The categories of third parties with whom we share that personal information.
  - The specific pieces of personal information we collected about you.
2. **Right to Request the Deletion of Your Personal Information:** You have the right to request that we delete your personal information, subject to certain exceptions.

3. Right to Request the Correction of Your Personal Information: You have the right request the correction of inaccurate personal information and provide any supporting documentation.
4. Right to Request the Opt-Out of the Sharing of Personal Information: You have the right to opt-out of the sale or sharing of your personal information.

We do not currently sell personal information and have not done so in the preceding 12 months.

We do not use sensitive personal information, as defined under CCPA, for purposes other than those specified in CCPA.

### **Method by Which an Employee or Applicant can Submit a Request**

In order to submit a request to exercise a right under CCPA, you must contact HR at [hrcompliance@santanderconsumerusa.com](mailto:hrcompliance@santanderconsumerusa.com).

Once we receive your request, we will proceed to verify your identity by matching the information provided by you with the information included in our records. To do so, you will have to provide the following: •

- Employee ID
- First, middle, and last name
- Current address
- Email
- Phone number

Additionally, if you ask us to provide you with specific pieces of personal information, we may request that you complete and return a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. A declaration form is included in the Request Form at the end of this Privacy Statement for your convenience.

### **Submitting Requests Through Your Authorized Agent**

You may designate an authorized agent to make requests to know and delete on your behalf. In order to do so, you will need to provide a completed Individual Request Form and the Authorized Agent Form that we have included in this Privacy Statement for your convenience. Please note that if you provide a valid Power of Attorney pursuant to the California Probate Code Sections 4121 to 4130, it is not necessary to provide the Authorized Agent Form.

### **Revisions to this Privacy Notice**

Last updated: December 18, 2023

Santander may, from time to time, make updates or changes to this Privacy Notice because of changes in applicable laws or regulations or because of changes in its personal data practices. Santander will give you notice of any material changes that impact your personal information, and where consent is necessary to make a change apply to its practices with respect to your personal information, Santander will not apply the changes to your personal data until it has that consent.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the bottom this Privacy Notice.

### **How To Contact Us**

If you have any questions regarding this Privacy Notice or Santander privacy practices, you may contact HR at [hrcompliance@santanderconsumerusa.com](mailto:hrcompliance@santanderconsumerusa.com).

The CCPA applies solely to California residents. If you are not a current California resident, we will not process your request. Any disclosure we provide will cover personal information that Santander Bank, N.A. has collected from you in the 12-month period immediately preceding the date we receive your request. We will attempt to provide a response to your request within 45 days. If we need additional time to respond to your request, we will notify you of such an extension and the time period needed to respond. In order to verify your request, we need to collect some identifying information to match it with the information within our systems. The accuracy of the information you provide has a direct impact on our ability to verify your identity and fulfill your request.

Please complete all applicable sections below and note that a request to know specific pieces of personal information may require the completion of the Declaration Form below, where you must affirm under penalty of perjury that you are the individual whose personal information is the subject of the request.

If you are filling out a request as an authorized agent, please complete the Authorized Agent Form below. Once completed, please print and send this Request Form to:

Santander Bank, N.A.  
Fulfillment Center  
Mail Code: RI1-EPV-0218  
P.O. Box 831001  
Boston, MA 02283-1001

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## *INDIVIDUAL REQUEST*

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Please select the nature of your request (select all that apply).

- ☐ Right to Know (categories of your personal information)
- ☐ Right to Access (specific pieces of personal information)\*
- ☐ Right to Delete
- ☐ Right to Correct

\*If you select this request you will need to complete the Declaration attached to this document, along with completing this section.

Please answer the following questions by selecting all the checkboxes that apply. Are you a current customer or have you ever been a customer?

- ☐ Yes ☐ No Have you ever applied for a product or service with us?
- ☐ Yes ☐ No

Please provide the following information.

First Name \_\_\_\_\_

Middle Name (if applicable): \_\_\_\_\_

Last Name: \_\_\_\_\_

Current Residential Address: \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone Number(s): \_\_\_\_\_

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CALIFORNIA CONSUMER PRIVACY ACT DECLARATION

I, \_\_\_\_\_,  
(insert name of person making the declaration)

declare under penalty of perjury that I am the consumer or agent for the consumer whose personal information is subject to the request for specific pieces of personal information under the California Consumer Privacy Act and that all the information I have provided to Santander Bank, N.A. accompanying the request is true and correct.

In \_\_\_\_\_, on \_\_\_\_\_  
(insert place of execution) (insert date of execution)

Print: \_\_\_\_\_

Signature: \_\_\_\_\_



## AUTHORIZED AGENT FORM

Please complete the following form in order to authorize a third party to exercise the California Consumer Privacy Act ("CCPA") rights listed below on your behalf.

Please note that if you provide a valid Power of Attorney pursuant to the California Probate Code Sections 4121 to 4130, it is not necessary to complete this Form.

I \_\_\_\_\_, resident at  
(insert individual's name)

\_\_\_\_\_, hereby appoint  
(insert individual's address)

\_\_\_\_\_, resident at  
(insert authorized agent's name)

(insert authorized agent's address)

as my authorized agent ("Authorized Agent") to perform any and all acts on my behalf in any lawful way with respect to the following subjects (please mark the specific rights you would like your Authorized Agent to be able to exercise on your behalf and, if you would like your agent to exercise all the rights under CCPA on your behalf, please mark the last category):

- ☐ Right to Know (categories of my personal information)
- ☐ Right to Know (specific pieces of my personal information)\*
- ☐ Right to Delete

\*If you select this request, you will need to complete the Declaration attached to this document, along with completing this section.

This authorization is effective immediately upon signature, until it is revoked. Revocation of this authorization is not effective as to a third party until the third party has actual knowledge of the revocation.

I agree that any third party who receives a copy of this document may act under it. I agree to indemnify the third party for any claims that arise against the third party because of reliance on this authorization.

By my signature, I acknowledge that I have read and understand the above information:

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_

(Signature of Individual)

**BY EXECUTING OR ACTING UNDER THIS AUTHORIZATION, THE AUTHORIZED AGENT HEREBY ACCEPTS THE APPOINTMENT AND ASSUMES THE FIDUCIARY AND OTHER LEGAL RESPONSIBILITIES OF AN AGENT.**

By my signature, I acknowledge that I have read and understand the above information:

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_

(Signature of Authorized Agent)