

Last Updated: March 2024

# THE CHARLES SCHWAB CORPORATION CANDIDATE PRIVACY NOTICE

We are committed to safeguarding your privacy. This Candidate Privacy Notice describes how The Charles Schwab Corporation and our affiliated entities ("Schwab," "we," or "our") collectively handle your personal information as a job applicant.

This privacy notice describes the personal information we collect, how we use your personal information, and how and when we disclose your personal information. This privacy notice does not address personal information Schwab may collect outside the scope of your applicant relationship. For example, this privacy notice does not address financial accounts you may hold with Schwab. For more information regarding Schwab's commitment to privacy, please see the <u>Charles Schwab Privacy Center</u>.

## **Information We Collect**

When you apply for a job and therefore create a profile by submitting your resume or if you register for job notifications on our website, you provide your personal information directly to us (or to our service provider).

For example, we collect the following categories of personal information directly from you or those acting on your behalf:

- Demographic and biographic information, including protected classification characteristics under applicable laws, such as name, gender, race and ethnicity.
- Contact information such as postal address, phone number and email address.
- Employment and education information you provide during the job application process such as resume and/or application, work history, professional licenses, education information, and references.

- Government issued and similar identifiers such as driver's license number, Social Security number, passport number, and other similar government issued identification numbers necessary to conduct background screenings.
- Audio visual information such as videoconference records, CCTV recordings, and voicemails, for example if you contact us as part of your application process or attend an interview in our offices.
- Internet or other network activity information regarding your interaction with our websites and applications through cookies and similar technologies, such as Internet Protocol addresses, device identifiers, server and application logs, browsing history, and related browsing information.

We may obtain personal information about you from other sources, including those publicly accessible, to assist us in verifying your identity.

We may also collect or create account access information including usernames and account recovery information (such as your security questions and answers) when you establish an account with us for your application or if we issue you a temporary password.

## **Use of Information**

We use your personal information to assess at your request your qualifications for employment with us, including for the purposes of conducting background screenings, and to fulfill your request as a job applicant. For example, we may contact you concerning your application or request additional information from you to consider your application.

We also use your personal information to support our everyday operations, such as our network and website infrastructure and our information security and fraud prevention programs; to comply with our internal policies and standards; and to meet our risk, legal, and compliance obligations, including government reporting requirements.

The basis for such processing is our legitimate interests in employing you in compliance with applicable laws.

## **Disclosure of Information**

We may disclose information about you as legally required or allowed for the purposes described above. We also may share your personal information in the following circumstances:

- With our service providers who perform recruitment services for us.
- With our service providers, law enforcement, and governmental agencies to detect and prevent fraud or criminal activity.
- With government officials when legally required to do so, such as in response to valid law enforcement process (e.g., warrant, court order, or subpoena).
- With third parties to whom you direct or authorize us to disclose your personal information, independent of or in connection with your relationship with Schwab.
- In connection with a corporate change, including a merger, business combination, acquisition or sale of all or any relevant portion of our business or assets.

Where possible, our disclosure of personal information to service providers is subject to agreements that require the service providers to use safeguards to protect your information and that restrict the use of your personal information for the purpose for which it was shared.

#### Data Storage & Security

We use appropriate administrative, technical, and physical safeguards to protect personal information. We also take reasonable steps to securely destroy or anonymize personal information when we no longer need it. We keep personal information for as long as is necessary for the purposes described above, unless we are required or permitted to keep it for longer by law, regulation or for the purposes of litigation or regulatory investigations.

In the event you enter into an employment relationship with Schwab we will maintain personal information consistent with the terms of our Employee Privacy Notice.

## Access and Update Your Personal Information

You can access and update your personal information by logging into your existing profile and clicking the "Update Your Profile" button. You may also withdraw your request to receive job notifications or to be considered for job applications at any time.

Please note that if you decide to restrict the processing of your personal information or if you withdraw your job application, we will not be able to further process your application or consider you for future opportunities at Schwab.

## Additional Information for California Residents

If you are a resident of California, you have data rights afforded to you under the California Consumer Privacy Act ("CCPA"). You have the right to request that we disclose certain information to you regarding your personal information we have collected from you. These rights include the right to know:

- 1. The categories of personal information we have collected about you.
- 2. The categories of sources from which your personal information is collected.
- 3. The categories of personal information that we have disclosed for a business purpose about you.
- 4. The categories of third parties to whom personal information was disclosed for a business purpose.
- 5. The business or commercial purpose for collecting, selling, or sharing personal information.
- 6. The specific pieces of personal information we have collected about you.

You also have the right to:

- 7. Request that we correct inaccurate information that we maintain about you.
- Request that we delete personal information about you that we have collected from you (unless an exception applies, or deletion is otherwise restricted or prohibited by law, rule, or regulation).

Please note that we do not sell or share your personal information with third parties for crosscontextual targeted advertising. We also do not knowingly sell or share personal information of consumers under 16 years of age.

## Instructions for Submitting a Data Rights Request

- To correct inaccurate profile information that we maintain about you, please log into your existing profile and click on the "Update Your Profile" button.
- For all other data rights described above, submit a request by contacting our Human Resources Help Desk by telephone at 800-725-3535 or by email at MyHR@Schwab.com.

You can designate an authorized agent to make a data rights request on your behalf. An authorized agent is a person or a business entity that you have authorized to act on your behalf. If you are an authorized agent and submit a data-rights request on behalf of a California consumer, we may require that the California consumer provide you with written authorization to make the request on their behalf and verify their own identity directly with us. Authorized agents can submit requests by contacting our Human Resources Help Desk as described above.

What to expect once you submit a request. We will work to confirm receipt of your request within 10 business days (and provide you with information on how we will process your request, including our verification process) and to respond to your request within 45 calendar days from the date of our receipt of your request (unless additional time is necessary, and, in such cases, we will explain to you the reason it may take more than 45 days to respond).

We may ask you to provide additional information to verify your identity. We will only use the additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. If additional information is required and we are unable to contact you with the contact information you have provided or are otherwise unable to sufficiently verify your identity, we may be unable to respond to your request.

If your data rights request covers the personal information of other individuals, including individuals with a shared address and device or service, we may be obligated to take additional steps to verify the request, including obtaining the consent of the other individuals whose personal information is covered by the request.

#### **Non-Discrimination**

You have the right not to receive discriminatory treatment for exercising any of these data rights. Schwab does not discriminate against any individual for exercising their rights under the CCPA.

## Additional Information for United Kingdom residents

If you are a resident of the United Kingdom, you have data rights afforded to you pursuant to the UK Data Protection Act 2018 (DPA) with respect to your personal information (or "personal data" as described in the DPA).

These rights include:

- 1. Access. You have the right to obtain access to your personal data.
- 2. Rectification. You have the right to ask for incorrect, inaccurate, or incomplete personal data about you to be corrected.
- 3. Erasure. You have the right to request that your personal data be erased.
- 4. Restriction on processing. You have the right to request the restriction of the processing of your personal data in specific cases.
- 5. Objection to processing. You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- 6. Portability. You have the right to receive your personal data in a machine-readable format and send it to another controller.
- 7. Withdrawal of consent. You have the right to withdraw any consent for Schwab's processing of your personal data. The basis for such processing, however, is our legitimate interests to employ you in compliance with U.K. laws.
- 8. Lodging a complaint with a Supervisory Authority. You have the right to lodge a complaint, as applicable, with the U.K.'s Information Commissioner's Office.

You can exercise the above data rights by contacting our authorized representative in the United Kingdom, Charles Schwab, U.K., Ltd. You may contact us at Tel: 0203 795 2704 or inquiry@schwab.com or, if by mail, please address your communication to Charles Schwab, U.K., Ltd. Attn: Compliance, 33 Ludgate Hill, London, EC4M 7NJ, United Kingdom.

## **International Transfers**

The Charles Schwab Corporation is based in the U.S. We transfer data outside of the U.K. when necessary, in order to review your candidacy for a position and as may be required by our legal obligations. Charles Schwab, U.K., Ltd. and Charles Schwab & Co., Inc., a wholly owned subsidiary of The Charles Schwab Corporation, have entered into Standard Contractual Clauses (SCC) for Charles Schwab, U.K., Ltd.'s transfer of personal data in the employment context to Charles Schwab & Co.

## **Contacting Us**

If you have any questions or comments about this privacy notice or any of Schwab's other privacy policies and practices, please call us at 800-435-4000.

Information privacy and security is a partnership and a key aspect of our business, and you can read about how we protect client accounts and information by visiting the <u>Charles Schwab Privacy Center</u>.

## Updates

We recognize privacy is an ongoing responsibility. We reserve the right to update or amend this privacy notice from time to time and any such updates or amendments will be reflected in the privacy notice available on our website.

When we make changes, we will update the "Last Updated" at the top of this page. Any changes to this privacy notice will become effective when posted.