

## **Encore Capital Group Online Applicant Privacy Policy**

Encore Capital Group and its subsidiaries supporting ECG's U.S. consumer business (collectively, "ECG" or "Company") are committed to protecting your privacy. Because we gather certain types of information about applicants during the recruitment process, we want to help you understand our practices surrounding the collection, use and disclosure of that information.

This Privacy Policy addresses the following topics:

- Your Consent
- Scope Of This Privacy Policy
- Equal Employment Opportunity (EEO) Statement
- The Personal Information We Collect About You And How We May Use It
- How We May Share Your Personal Information
- International Transfer Of Your Personal Information
- Security For Your Personal Information
- Updating Your Personal Information/Questions About This Privacy Policy/Revoke Your Consent
- Changes To This Privacy Policy

### **Your Consent**

By checking the box before submitting your online application or before agreeing to receive job alerts, you consent to the collection, use and disclosure of your personal information as described in this Privacy Policy. Personal information is information that identifies you, or could reasonably be used to identify you individually, such as your name, e-mail address, and telephone number. Before you agree to the terms of this Privacy Policy by checking the box before submitting your online application or agreeing to receive job alerts, please read this Privacy Policy carefully. Once you agree, your consent will continue to apply to our collection, use and disclosure of your personal information unless you revoke your consent by contacting us at [talent@mcmcg.com](mailto:talent@mcmcg.com). If you do not want us to handle your personal information as described in this Privacy Policy, please do not use [Careers.joinmcm.com](http://Careers.joinmcm.com) (also referred to as "Site").

### **Scope Of This Privacy Policy**

This Privacy Policy applies only to information collected for recruitment purposes through Careers.joinmcm.com and from other sources. The other sources might include information obtained, for example, from prior employers, other references, pre-employment screening providers, and other sources. This Privacy Policy does not apply to any other site or page that we own or operate. Our other sites have their own privacy policies.

The Site may contain links to sites hosted by ECG's subsidiaries and affiliates. Your use of each of those sites is subject to the conditions, if any, that each of those sites has posted. You should check any privacy policy posted at those sites for information concerning how your personal information submitted through those sites will be handled.

### **The Information That We Collect About You And How We Use It**

#### The Personal Information We Collect

If you are interested in employment with the Company and you choose to submit an online application or to submit additional information to us, we will use that information to evaluate your application for employment and for related recruiting, reporting and recordkeeping purposes. The categories of personal information that we may collect about you during the recruitment process include the following: [Littler Note: Please carefully review the chart below and delete or modify any language that does not align with Encore's hiring process. In addition, please let us know if Encore collects any of the following categories of information from applicants: geolocation information, biometric information, information regarding protected characteristics (such as EEO-1 information), or Internet or other similar network activity (for example, when an applicant uses a guest WiFi. Please also consider any purposes listed below and modify, delete or add purposes as appropriate to ensure accuracy.]

<ul style="list-style-type: none"><li>• <b>Identifiers:</b> Real name, postal address, telephone number, e-mail address, signature, online identifier, Internet Protocol (IP) address, and state identification card number.</li></ul>
<ul style="list-style-type: none"><li>• <b>Medical information:</b> If you request an accommodation in connection with the hiring process, we may collect medical information about you.</li></ul>
<ul style="list-style-type: none"><li>• <b>Professional or Employment-Related Information:</b> We may collect your resume and information about your job history, educational history, affiliation and membership in professional organizations, clinical competencies, and professional licenses and/or certifications.</li></ul>
<ul style="list-style-type: none"><li>• <b>Education Information:</b> We may collect education information including academic transcripts.</li></ul>
<ul style="list-style-type: none"><li>• <b>Background Screening Information:</b> We collect background screening information (either directly or through a background check vendor in compliance with the federal Fair Credit Reporting Act), including results of the following types of background screening: criminal history; sex offender registration; motor vehicle records; credit history; employment history; drug testing; licensing and credential history; and educational history.</li></ul>
<ul style="list-style-type: none"><li>• <b>Profile Data:</b> When evaluating your application for employment with the Company, we may collect profile data about you, including information about your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</li></ul>
<ul style="list-style-type: none"><li>• <b>Commercial Information:</b> If you travel to our offices for an in-person interview, we may collect commercial information, including, your purchases of products and services in connection with your visit to our office, so we can reimburse your expenses.</li></ul>
<ul style="list-style-type: none"><li>• <b>Geolocation Data:</b> If you allow us to determine your location from your browser and IP address when searching for a position on the Site, we may collect this information about you, so the Site can present job opportunities in the city closest to your current location.</li></ul>
<ul style="list-style-type: none"><li>• <b>Sensory or Surveillance Data:</b> If you visit our offices for an in-person interview, we may collect footage from video surveillance cameras that are present in our facility for general security purposes only.</li></ul>

You are responsible for providing information that is accurate, complete and up to date when you submit it through the online application. If you apply for a position, the Company also may collect personal

information about you from third parties, such as those listed in the section entitled “Scope of this Policy”, by telephone, letter, fax, email or other means.

#### Sensitive Personal Information

When you apply for a position in the United States, or indicate the U.S. as a preferred location when registering your profile, you will have the opportunity to provide information about your gender, race or ethnicity and/or veteran status in order for us to conduct equal opportunity monitoring. The provision of this information is entirely voluntary. If you decline to provide this information, your application(s) will not be affected in any way. If you do choose to provide this information, you consent to our using it for equal opportunity monitoring purposes. This information will be held and stored anonymously and will not be used to evaluate your application for employment.

Except as described above, we will not request or otherwise collect information about your health, race or ethnic origin, political opinions, religious or philosophical beliefs, socioeconomic condition, trade-union membership, sexual orientation, financial information, genetic information, or biometric information through the on-line application or during the application process unless the law, as an exception, requires us to do so. We, or a third-party background check company under direction, may check criminal history records for information about convictions, but only if and to the extent permitted by applicable law.

#### How We Use Your Personal Information

We will use the information we collect about you to evaluate your application for employment and for related recruiting, reporting and recordkeeping purposes, such as to check references or to conduct pre-employment screening. In addition, if the Company hires you, the information that you submitted will become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. We may also use information that you provide to send you alerts about opportunities which may be of interest to you and to communicate with you about those opportunities.

The Company will retain information of applicants who are not hired after the hiring decision has been made as required by law unless the applicant indicates that the Company may maintain the information on file for a longer period of time or until the applicant asks the Company to delete the information. These records will be retained for our internal recordkeeping and reporting purposes. During that time, we may use your information to consider you for positions in addition to the position(s) for which you initially applied. In addition, the Company may e-mail you regarding positions which may be of interest to you. If you wish to withdraw your application from consideration at any time during this retention period, you can do so by contacting us at [talent@mcmcg.com](mailto:talent@mcmcg.com).

As described further below, we track your online activities over time and across third-party websites or online services. For example, we use web beacons to help us determine what links or advertisers brought you to our Site. We also track your activities on our Site and link the personal information you have provided us, for example, your name, with your activities on our Site and on other websites.

When collecting your personal information is mandatory (either because of applicable law or in accordance with a contractual requirement), this will be stated at the time of collection of the personal information. If you choose not to provide the mandatorily required personal information, we might not be able to consider your application for employment.

## Information We Collect Through Technology

### **Do We Use Cookies?**

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. We use cookies to help us understand and save your preferences for future visits to the Site. For example, when you return to the Site after logging in, cookies provide information to the Site so that the Site will remember who you are.

When you visit the Site, you may use the cookie consent options to control the information you would like us to remember about you. If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. Like most websites, if you turn your cookies off, some of the features on the Site may not function properly.

### **Web Beacons**

We include small graphic images or other web programming code, called web beacons (also known as "pixel tags", "web bugs" or "clear GIFs"), on the Site. The web beacons are minute graphics with a unique identifier. They are used to track the online movements of Web users. In contrast to cookies, which are stored in a user's computer hard drive, web beacons are embedded invisibly on Web pages and are about the size of the period at the end of this sentence.

### **Other Information Collected Automatically**

When you visit the Site, we collect your device identifier, browser information, and Internet Protocol (IP) address. An IP address is often associated with the portal you used to enter the Internet, like your Internet service provider (ISP), company, association, or university. While an IP address may reveal your ISP or geographic area, we cannot determine your identity solely based upon your IP address.

### **Third-Party Cookies**

We use cookies provided by third-party service providers, to assist us in better understanding our Site visitors. These cookies collect data such as the length of time a user spends on a page, the pages a user visits, and the websites a user visits before and after visiting the Site. Based on this information, the third-party service providers compile aggregate data about Site traffic and Site interactions, which we use to offer better Site experiences and tools in the future. These third-party service providers include Phenom People whose various policies can be found at the following web addresses:

<https://www.tmp.com/privacy/>; <https://www.tmp.com/terms/>; and <https://www.tmp.com/metrics-terms/>.

### **Your 'Do Not Track' Browser Setting**

We have the capability to support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit know that you do not want the websites collecting your personal information.

### **How We May Share Your Personal Information**

The Company will not sell, lease, or license your personal information to any third party. There are limited circumstances when the Company may share the information that you submit on-line with third parties, most notably:

- With third-party service providers. We may, for example, retain a third party to host some or all or portions of this site, to help maintain and manage our databases, to assist in the recruiting process, or to communicate with applicants and with individuals who enter information into the Site but do not complete the application process. We prohibit providers from using your information for other purposes and from further disclosing your information without our prior approval;
- With affiliated companies, such as grandparent, parent and/or subsidiary corporations, for their recruitment, recordkeeping and/or reporting purposes;
- When required by law, such as when we respond to subpoenas, court orders, legal process, or a discovery request;
- If we believe that your actions violate applicable law, or threaten the rights, property, or safety of our Company, our users, or others;
- If we sell some or all of our business, we may disclose all of the information that we have collected about you to a purchaser or, in due diligence, to a potential purchaser but subject to a confidentiality agreement.

The Company does not share your personal information with third parties so that they can use your personal information to advertise the third parties' goods and services to you.

**Children's Privacy** We do not collect any information from anyone under 13 years of age. The Site is directed to people who are at least 13 years old or older. If you are under the age of 13, you are not authorized to use the Site.

#### **International Transfer Of Your Personal Information**

Depending on the location of the position for which you apply, the personal information that you provide may be downloaded to a server maintained by the Company, or by a service provider under contract with the Company and located in the United States or in another country besides your country of residence. Authorized Company employees at locations within or outside the United States may have access to your personal information as part of the recruitment process. These employees may use and disclose your personal information only for recruitment purposes, and must handle that information in accordance with this Privacy Policy.

#### **Security For Your Personal Information**

We want you to feel confident about using [Careers.joinmcm.com](http://Careers.joinmcm.com), so we have implemented a security program to keep information that is transmitted to our systems protected from unauthorized access. Your submissions of information to our secure server are protected by Hypertext Transfer Protocol Secure ("HTTPS") and Transport Layer Security (TLS) technology, utilized by many popular browsers to safeguard transmissions. This technology allows us to use encryption tools to protect information transmitted between your computer and our server. Through encryption, the personal information you enter, including your name and address, is converted into code that is then securely dispatched over the Internet. Once our secure server receives your encrypted personal information, it is translated back into its original form and stored in our off-line database. After we have received your information, access to it is limited to those with a need to know.

While we strive to protect your personal information, we cannot guarantee the security of any information that you submit, and you do so at your own risk. We urge you to keep your username, password and any other log-in credentials in a safe place as you share responsibility for maintaining the confidentiality of the information that you submit to us. It is a good practice to sign off your account and close your browser window when you have finished your visit to [Careers.joinmcm.com](http://Careers.joinmcm.com).

**Updating Your Information/Questions About This Privacy Policy/Revoke Your Consent**

If you would like to access the information that you have submitted to Careers at ECG, wish to request that we update, modify, or delete your information, or if you have any questions about this Privacy Policy, please contact [talent@mcmcg.com](mailto:talent@mcmcg.com). You also can contact us at that e-mail address if you would like to revoke your consent to our using and disclosing your personal information as described in this notice. Any revocation will be effective only prospectively.

**Changes To This Privacy Policy**

The Company may change this Privacy Policy from time to time in its sole discretion. If we make a material change to this Privacy Policy, we will inform you by posting a notice on this site. Those changes will go into effect on the effective date posted in the revised notice. The new policy will apply to all current and past users of careers.encorecapital.com and to all information collected before the date of the change. The new policy will replace any prior policies that are inconsistent. Please check periodically for changes to this Privacy Policy, and especially before you provide any personal information to us.