

Privacy Notice for Applicants

Effective: August 1, 2023

Deluxe collects and uses information that relates to an identified or identifiable person, whether alone or in combination with other information (“Personal Information”), including sensitive personal information, for human resources, employment, and business-related purposes listed in the table below. We are committed to properly handling the Personal Information collected or processed in connection with your application for employment with us.

Deluxe retains Personal Information as long as necessary according to our enterprise records retention schedule. Retention period calculations are based upon the time the Personal Information is needed to satisfy the purposes described in our [Privacy Policy](#), to comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), operational requirements, and to fulfill your requests.

Personal Information Categories and Business Purposes

We may collect and use the Personal Information categories listed in the table below. However, Deluxe will not:

- Collect Personal Information categories not disclosed in this notice
- Use the Personal Information for additional purposes that are incompatible with use purposes disclosed in this collection notice
- Sell the Personal Information we collect about our applicants for employment or share it with third parties for cross-context behavioral advertising

<u>Personal Information Category</u>	<u>Business Purpose</u>
<p>Identifiers, such as:</p> <ul style="list-style-type: none"> • Real name • Nickname • Alias • Postal address • Telephone number • Contact information • Driver’s license or state identification card • Passport or visa information • Gender and/or gender identity • Date of birth • Signature • Social Security number • Contents of video interviews 	<ul style="list-style-type: none"> • Recruit and process employment applications, including verifying eligibility for employment and conducting background and related screening • Maintain personnel records and comply with record retention requirements • Comply with applicable state and federal labor, employment, tax benefits, disability, equal employment opportunity, workplace safety, and related laws • Respond to law enforcement requests and as required by applicable law or court order

<p>Professional or employment-related information, such as:</p> <ul style="list-style-type: none"> • Education records • Degrees and vocation certifications obtained • Employment history • Membership in professional organizations • Licenses and certification • Writing samples • Eligibility for certain benefits programs 	<ul style="list-style-type: none"> • Conduct internal audits, and investigate complaints, grievances and suspected violations of Deluxe policy • Exercise or defend the legal rights of Deluxe and its employees, affiliates, customers, contractors, and agents • Arrange and manage Deluxe-sponsored job fair and recruiting events • Evaluate applicants' qualifications for employment with Deluxe • Communicate with applicants • Create a talent pool for future job openings • Demonstrate applicants' agreement to, or acceptance of documents presented to them (e.g., acknowledgement of employment application, offer letter) • Evaluate and improve the recruiting process
<p>Protected classification characteristics under state or federal law*, such as:</p> <ul style="list-style-type: none"> • Age • Race • Color • Ancestry • National origin • Citizenship • Religious or philosophical beliefs • Immigration status and documentation • Medical condition • Physical or mental disability • Sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions) • Military and veteran status <p><i>*Deluxe collects this category of Personal Information on a voluntary basis, except where collection is required by law, and uses the information only in compliance with applicable laws and regulations</i></p>	<ul style="list-style-type: none"> • Comply with federal and state equal employment opportunity laws • Design, implement, and promote Deluxe's diversity and inclusion programs • Perform workforce analytics, data analytics, and benchmarking • Respond to law enforcement requests and as required by applicable law or court order • Conduct internal audits, and investigate complaints, grievances and suspected violations of Deluxe policy • Exercise or defend the legal rights of Deluxe and its employees, affiliates, customers, contractors, and agents

<p>Biometric, Sensory, or Surveillance Data</p> <ul style="list-style-type: none"> • Video surveillance • Fingerprints • Voicemails 	<ul style="list-style-type: none"> • Prevent unauthorized access, use, or loss of Deluxe property when onsite for interview purposes • Fingerprinting for a criminal background check after an initial offer of employment is made. Criminal background screens protect the company, mitigate risk, and avoid potential negligent hiring lawsuits • Communicate and receive messages with applicants
<p>Internet or other similar network activity information</p> <ul style="list-style-type: none"> • Including all activity on Deluxe's information systems such as: <ul style="list-style-type: none"> ○ Email communications ○ Stored documents and emails ○ Usernames and passwords • All activity on communications systems such as: <ul style="list-style-type: none"> ○ Voicemails ○ Text messages ○ Chat logs 	<ul style="list-style-type: none"> • Facilitate the efficient and secure use of Deluxe information systems • Ensure compliance with Deluxe information systems, policies and procedures. • Comply with applicable state and federal laws and regulations • Prevent unauthorized access to, use, or disclosure or removal of Deluxe's property, records, data, and information • Conduct internal audits and investigate complaints, grievances, and suspected violations of Deluxe policy • Exercise or defend the legal rights of Deluxe and its employees, affiliates, customers, contractors, and agents • Communicate and receive messages with applicants
<p>Applicant profile information, such as:</p> <ul style="list-style-type: none"> • Employment application information • Work history • Academic and professional qualifications • Educational records • Transcripts • References • Interview notes • Background screening • Drug testing results • Work authorization 	<ul style="list-style-type: none"> • Recruit and process employment applications • Maintain personnel records and comply with record retention requirements • Comply with applicable state and federal labor, employment, tax, benefits, disability, equal employment opportunity, workplace safety, and related laws • Conduct internal audits and investigate complaints, grievances, and suspected violations of Deluxe policy • Evaluate applicants' qualifications for employment with Deluxe

	<ul style="list-style-type: none"> • Process employment applications, including verifying eligibility for employment and conducting background and related screening • Exercise or defend the legal rights of Deluxe and its employees, affiliates, customers, contractors, and agents
<p>Inferences drawn from other Personal Information to create a profile or summary, for example:</p> <ul style="list-style-type: none"> • An individual's preferences, abilities, aptitudes, and characteristics 	<ul style="list-style-type: none"> • Evaluate applicants' qualifications for employment with Deluxe • Conduct applicant reference checks to assist in hiring decisions

Other Purposes Potentially Applicable to Any Categories of Personal Information Listed Above

Deluxe may also use applicants' Personal Information to facilitate administrative functions, information technology operations, corporate transactions, and for legal reasons. These functions may include:

- To manage litigation and other legal disputes and inquiries involving Deluxe, and to meet legal and regulatory requirements
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Deluxe or any of its subsidiaries or affiliates
- To manage licenses, permits and authorizations applicable to Deluxe's business operations

Information Provided About Other Individuals

If you provide us with Personal Information of a reference or any other individual as a part of your application, it is your responsibility to inform them of this Notice and obtain consent from that individual prior to providing the information to Deluxe.

Sources of Your Personal Information

During the application process, Deluxe may collect Personal Information about you from the following sources:

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide to us during the course of your application and interview process
- **Vendors and service providers**, for example, recruiters
- **Third parties**, for example, job references, affiliated companies, professional employer organizations or staffing agencies

- **Public internet sources**, for example, social media, job boards, public profiles, and other public online sources
- **Public records**, for example, court records, and credentialing and licensing organizations
- **Automated technologies on Deluxe's electronic resources**, for example, to track logins and activity on Deluxe's careers page
- **Surveillance/recording technologies installed by Deluxe**, for example, video surveillance in common areas of Deluxe facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law
- **Government or administrative agencies**, for example, law enforcement or public health authorities
- **Acquired company**, if Deluxe acquired your employer, Deluxe might collect Personal Information from that employer

How We May Disclose Your Personal Information

From time-to-time, Deluxe may have a legitimate business need to disclose your Personal Information for one of the businesses purposes listed above. Deluxe may disclose your Personal Information to the following:

- **Service providers and contractors:** Deluxe discloses your Personal Information to service providers and subcontractors for the purposes above to assist us in our recruiting efforts and in meeting our business needs and legal obligations
- **Government or administrative agencies:** These may include, for example:
 - Equal Employment Opportunity Commission as required for reporting
 - Departments of Fair Employment and Housing as required to response to employment claims and charges
 - Law enforcement in the event of criminal investigations
- **Required Disclosures:** We may be required to disclose Personal Information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law
- **Legal Compliance and Protections:** We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Deluxe, our users, or others

Changes to this Notice

As required by state privacy laws, Deluxe will review and revise this Notice on an annual basis. Updates to this Notice will be posted on Deluxe's job applicant site.

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact Deluxe Human Resources via [HR Answers](#).