

## **UNITED STATES Privacy Notice**

### **I. Important U.S. EMPLOYMENT Notices and Terms of Use**

The following notices and terms of use are provided by State Street Bank and Trust Company, its parent and all other related affiliates and subsidiaries (collectively, "State Street") in order to provide candidates for employment with State Street important information regarding applicable legal rights, as well as the State Street application process.

To indicate your understanding and consent to the notices set forth below, and attached hereto, please click the 'I agree' statement at the end of this page.

#### **Background Investigation Notice**

Any future offer of employment by State Street is contingent upon satisfactory completion of a background investigation (which may include but may not be limited to credit history, criminal background, Office of Foreign Asset Control (OFAC) verification, and education and employment verification). In addition, in the event of a future offer and acceptance of employment by State Street, State Street's procedure is to obtain fingerprints and send them to the Federal Bureau of Investigation to ensure compliance with certain provisions of the Federal Deposit Insurance Act. Further, if you are a current or former Registered Person with the National Association of Security Dealers (NASD), your consent below shall constitute authorization for State Street to review, prior to and for employment purposes, your NASD Charles River Development (CRD) record, including but not limited to current and previous employment history, disciplinary actions, disclosures and disclosure review and any other relevant information provided within your record.

You are hereby advised that, when evaluating you for employment, or for promotion, reassignment or retention within the company (if you are hired or placed), State Street may wish to obtain a "consumer report" and/or an "investigative consumer report" from a "consumer reporting agency" about you.

States may enforce the Fair Credit Reporting Act (FCRA), and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General.

Your consent below indicates that you have reviewed and understand the information contained within the link, and that you consent to State Street's background check process with respect to any and all applications for employment with State Street which you submit now or in the future, including a consumer report and/or investigative consumer report, as well as additional inquiries in order to verify educational and employment history. Your consent below shall further indicate that you agree to hold State Street and any educational institution or former employer harmless from any claims by you on the basis of information received or provided in connection with this background investigation process.

#### **Legal Notices**

A candidate may include any verified work performed on a voluntary basis in the candidate's employment history.

It is unlawful to require or administer a lie detector test as a condition of employment or continued employment. An employer in Massachusetts who violates this law shall be subject to criminal penalties and civil liability.

A candidate for employment may answer "no record" to the question of whether he or she has been convicted of a felony if the candidate has a sealed, closed, annulled, erased, expunged or otherwise eradicated record.

A candidate for employment in Massachusetts may answer "no record" to the question of whether he or she has been convicted of a felony with respect to any inquiry relative to prior arrest, court appearances and adjudications in all cases of delinquency or as a child in need of services which did not result in a complaint transferred to the superior court for criminal prosecution.

A candidate for employment in California may answer "no record" to the question of whether he or she has been convicted of a felony with respect to convictions under California Health & Safety Code §§11357(b) or (c), 11360(b) (formerly subdivision (c) of section 11360), 11364, 11365, or 11550 related to marijuana offenses that occurred two or more years before the instant application. A candidate for employment in California also may answer "no record" to the question of whether he or she has been convicted of a felony with respect to a referral to, and participation in, any pretrial or post trial diversion program.

A candidate for employment in New York also may answer “no record” to the question of whether he or she has been convicted of a felony with respect to a referral to any criminal proceeding that terminated in a “youthful offender adjudication”.

#### **Notice of Additional Conditions to Employment**

Any future offer of employment by State Street is contingent upon your provision of employment eligibility documents which comply with the Immigration Reform and Control Act, verification of employment eligibility through the federal government’s E-Verify system, and execution of State Street’s Standard of Conduct, Confidentiality Agreement and related documents.

#### **At-Will Employment Notice**

Employment with State Street is at-will, which means that the employment relationship can be terminated by State Street or its employees at any time and for any reason.

#### **Equal Opportunity Employment Statement**

As an Affirmative Action/Equal Opportunity Employer, we consider applications for all positions without regard to race, creed, color, religion, national origin, ancestry, ethnicity, age, disability, genetic information, sex, sexual orientation, gender, gender identity or expression, citizenship, marital status, domestic partnership or civil union status, familial status, military and veteran status, and other characteristics protected by applicable law. For more information [refer to our CEO Statement](#).

#### Know Your Rights

**Pay Transparency Policy Statement** - State Street will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by State Street, or (c) consistent with State Street’s legal duty to furnish information. 41 CFR 60-1.35(c)

#### Employee Rights Under the National Labor Relations Act

## **II. Important PRIVACY NOTICE AND CONSENT**

State Street Bank and Trust Company, its parent and all other related affiliates and subsidiaries (collectively, “State Street”) respect your privacy and value our relationship with you.

This Privacy Notice applies to our privacy practices for the handling of data submitted by a candidate to State Street through to their recruitment as an employee. It describes the types of personal data we collect, how we may process that information and who we can share it with. This Privacy Notice also describes the measures we take to protect the security of your personal data.

Please read this Privacy Notice carefully. To indicate your consent to your personal data being processed as set out below, please click the ‘I agree’ statement at the end of this page.

#### **Personal data**

This Privacy Notice relates to the information that is personally identifiable to you that you - or someone else on your behalf - provide to State Street in the context of an application for a position with State Street (“Candidate Data”).

This Privacy Notice, unless noted otherwise, does not form part of any contract of employment.

Scope of this Privacy Notice

- This Privacy Notice applies to Candidate Data submitted via State Street’s online submission process, e-mail or paper submission to State Street personnel or to or by a third party service provider into an electronic database based in the United States or Belgium accessible by authorized personnel.
- References to “processing” or “processes” mean any activity which involves the use of Candidate Data, whether in whole or in part by automated means or otherwise, such as collecting, recording, organizing, storing, modifying, using, disclosing, or deleting such Candidate Data.
- This Privacy Notice does not cover Candidate Data that has been made anonymous.

**How your data is processed**

Candidate Data will be:

- Relevant to and not excessive for the purposes for which it is collected
- Kept up-to-date, with necessary steps taken to rectify or delete information that is inaccurate or incomplete if State Street becomes aware of such occurrences
- Kept only as long as is reasonably necessary for the purposes for which it was collected and processed or, as otherwise required to comply with applicable laws
- Subject to appropriate technical and organizational measures to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage

**Data collection**

State Street may periodically collect further information from you. For example, we may require additional information to perform background checks or obtain approvals which may be a condition to employment. In addition, State Street may collect your feedback and opinions (e.g. through surveys) for business purposes, such as improving processes. You may respond to these surveys voluntarily or may elect not to respond. You will not suffer reprisals for your decision not to participate in such surveys.

*Cookies and IP addresses*

We may collect certain data by automated means when you visit our websites or web-based interfaces, such as how many users visited our sites and the pages accessed. By collecting this data, we learn how to best tailor our website to our visitors. We collect this information through “cookies” and IP addresses.

*Cookies*

Like many organizations, we use “cookies” on our websites. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify site features in which you may have the greatest interest.

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies, you may not be able to take advantage of all our website features.

*IP addresses*

An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our websites, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and to understand from what regions of the world our web visitors come.

**Types of Candidate Data**

Candidate Data that may be processed (subject to applicable local laws) includes:

- Employment status
- Employment details including without limitation work history/job data
- Prior education and training
- Compensation and benefit information history
- Past and current employer feedback
- State Street online questionnaire results
- Contact information
- Previous addresses or names

- Additional information provided by the candidate (e.g. a cover letter)
- References
- Race and ethnic origin (optional as required or allowed by law)
- Financial details and family lifestyle and social circumstances as necessary (e.g. where a candidate is being considered for an expatriate assignment) (as permitted by applicable laws)
- Background Check information (including, where applicable, criminal and credit history)

In addition, all candidates are required to declare personal relationships with Public Officials<sup>1</sup> and Senior Level Persons<sup>2</sup> on their application form. No offer of employment or internship may be made unless the qualifications of such candidates and the hiring process have been independently assessed by Talent Acquisition to meet the minimum standard.

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<sup>1</sup> A Public Official means an individual acting in an official capacity for any public entity. This can include a broad spectrum of entities, roles, and responsibilities, such as:

- any officer or employee of any government, department, agency, or instrumentality of a government, whether national, regional, or local;
- any officer or employee of a public international or supranational organization such as the United Nations or World Bank;
- any officer or employee of government owned or controlled companies or entities, including financial institutions, central banks, sovereign wealth funds, or educational institutions;
- any candidate or holder of political office;
- any officials or representatives of a political party;
- any officer or employee of civil or military or security agencies or instrumentalities;
- any officials and representatives of legislative or judicial offices
- any members of a royal family; and any person acting in an official capacity for or on behalf of any of the aforementioned individuals, including any agents or consultants.

<sup>2</sup> The term Senior Level Person means high-ranking executives of a State Street business partner. These individuals may hold positions of influence and power over decision-making. Examples include, but are not limited to:

- Chief Executive Officer (CEO)
- Chief Information Officer (CIO)
- Chief Financial Officer (CFO)
- Chief Operating Officer (COO)
- Chief Compliance Officer (CCO)
- Senior Investment Officer

### **Special categories of Candidate Data**

State Street recognizes that certain jurisdictions have enacted laws which require higher protection of certain sensitive personal data, such as state or national ID numbers, or other information regarding racial or ethnic origin, political opinions, religious or political beliefs, trade-union membership, health or medical records, or criminal records ("Special Data"). By agreeing to this Privacy Notice, you explicitly consent and opt-in to your sensitive personal data being processed for the purposes set out in this Privacy Notice.

### **Security and confidentiality**

#### *Equipment and Information Security*

To safeguard against unauthorized access to Candidate Data by third parties outside State Street, all electronic Candidate Data held by State Street is maintained on systems protected by secure network architectures that contain firewalls and intrusion detection devices. The servers holding Candidate Data are "backed up" (e.g. recorded on separate media) on a regular basis in an effort to avoid any inadvertent erasure or destruction of Data. The servers are stored in facilities with appropriate security and fire detection and response systems.

#### *Access security*

State Street limits access to the internal systems that hold Candidate Data to a select group of authorized users, each of whom are given access through the use of a unique identifier and password. Access to Candidate Data is limited to such individuals for the sole purpose of performing their job duties (e.g. a human resources manager may need access to a candidate's contact information for the purposes of setting up an interview).

### **Sharing of Candidate Data**

State Street may share the information you provide among our subsidiaries and affiliates as required and as permitted by law. State Street may also share Candidate Data with third party service providers to perform services on our behalf.

In addition, State Street may disclose Candidate Data (i) if State Street is required to do so by law or legal process or to enforce any rights State Street may have against you as necessary, (ii) to law enforcement authorities or other government officials, (iii) when State Street believes disclosure is necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or actual illegal activity, or (iv) if this is necessary to protect the vital interests of a person. Third party service providers may disclose Candidate Data to other third parties for business purposes such as: governmental authorities for immigration or visa issues, as a matter of law or legal process (e.g. to tax and social security authorities), to protect State Street legal rights (e.g. to defend a litigation suit) or as part of litigation involving such third party; or in an emergency where the health or security of a candidate or Candidate Data is endangered (e.g. a fire or natural disaster); or, for such other purpose required for business operation or by local laws.

State Street requires its third-party servicers to agree to comply with appropriate privacy and security standards or to undertake to provide similar and appropriate levels of protection as State Street when processing Candidate Data.

State Street reserves the right to transfer Candidate Data once an individual is hired in the event that State Street sells, transfers or merges all or a portion of the business or assets to the extent permitted by applicable law.

### **Information we transfer and storage**

State Street will process the Candidate Data in the United States and may transfer the Candidate Data to other jurisdictions where State Street does business, which may not have the same data protection laws as the jurisdiction in which you reside. The transfer of Candidate Data to other countries is based on a business need or to comply with applicable laws. Candidate Data will be stored on servers located in the United States. Candidate Data stored or processed in a foreign jurisdiction may be accessed under a lawful order made in that jurisdiction.

By agreeing to this Privacy Notice, you explicitly consent and opt-in to your Candidate Data being exported and stored to other countries including the countries outside the EEA, for the purposes which we have explained.

### **Contacting you**

State Street, or third party service providers acting on our behalf may need to contact you, either by post or email, in connection with your application for a position at State Street, or to provide information about State Street which we feel may be of interest to you. In agreeing to this Privacy Notice, you provide your explicit consent to being contacted for these purposes.

### **Your rights**

Depending on the applicable State, as a person who provides State Street with Candidate Data, you may inquire as to the nature of the Candidate Data stored at and/or processed by State Street. Where entitled to, you will be provided reasonable access to Candidate Data held by State Street and, where appropriate, with the ability to review and correct inaccuracies. State Street will cooperate in providing such access. All such requests for access may be made by sending a request in writing to: [privacyoffice@statestreet.com](mailto:privacyoffice@statestreet.com).

To help protect your privacy and provide security, State Street takes reasonable steps to verify your identity before granting access to information. State Street shall respond to such reasonable request made by you within the applicable statutory period as required under applicable law, after your identity has been confirmed and you have clarified the specific personal information that you require. If you demonstrate that the purpose for which the Candidate Data is being processed is no longer legal or appropriate, the Candidate Data will be deleted, unless the law or applicable data retention requirements require otherwise.

### **Updates to our Privacy Notice**

This Privacy Notice may be updated periodically to reflect changes in our information practices or as may be required by law. State Street will post a notice on this site to notify you of any changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated. You can tell that the Notice has been updated by looking at the publication date at the top of each page.

### **How to contact us**

If you have questions or comments about this Privacy Notice, or about how your data is processed, please contact us at [privacyoffice@statestreet.com](mailto:privacyoffice@statestreet.com).

### **CONSENT**

I have read and understand both the U.S. Employment Notice and Terms and the Privacy Notice both set forth above. By submitting my Candidate Data, I confirm and agree that:

- I have fully reviewed both of the important notices and terms of use above;
- I have reviewed and understand the applicable Fair Credit Reporting Disclosure and Authorization Notice, and consent to State Street's background investigation process;
- I am advised to print or download the applicable Fair Credit Reporting Disclosure and Authorization Notice, as well as this Important Notices and Terms of Use page for my records;
- State Street and/or its third party service providers may possess and process the Candidate Data according to the terms set out in this Privacy Notice;
- my Candidate Data can be transferred between State Street affiliates and third party service providers worldwide and will likely be transferred to the United States and stored on a server in the United States consistent with this Privacy Notice; thus my Candidate data will be accessible to authorities under the laws of the jurisdiction in which it is held and stored;
- my sensitive personal data can be processed in accordance with this Privacy Notice;
- I am responsible for periodically reviewing this Privacy Notice to ensure that I am informed of any change or update to terms of this Privacy Notice; and
- I agree and acknowledge that my on-line electronic consent is equivalent to a binding legal signature.

Yes, I have read and consent to the terms and conditions