

## RBC JOB APPLICANT PRIVACY NOTICE

### 1. INTRODUCTION

In the context of your employment application, RBC is responsible for deciding how we hold and use personal information (personal data) about you and for what purposes; under GDPR and the UK GDPR, RBC is a “data controller”. You are being presented with a copy of this privacy notice because you are applying for work with us (whether as an employee or contractor). This notice informs you what information we will collect about you and how we will use it, in relation to the purposes of the recruitment exercise. It will also inform you for how long your data will be retained for and provides you with certain other information that must be provided under the applicable data protection or privacy law.

### 2. DATA PROTECTION PRINCIPLES

We will comply with applicable data protection law with respect to the processing of your personal information obtained in the process of your employment application. This means that the personal information we hold about you must be:

- a. Used lawfully, fairly and in a transparent way;
- b. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- c. Relevant to the purposes we have told you about and limited only to those purposes;
- d. Accurate and kept up to date;
- e. Kept only as long as necessary for the purposes we have outlined in this Applicant Privacy Notice; and
- f. Kept securely.

### 3. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION?

The RBC company that you are applying to is responsible for your personal information. For further information on the entity responsible for your personal information, please reach out to [RBCCareers@rbc.com](mailto:RBCCareers@rbc.com) or to [DPO@RBC.com](mailto:DPO@RBC.com) (Europe, UK Channel Islands).

### 4. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

In connection with your application for work, RBC will collect and create personal information about you during the course of your application with RBC. Personal information is data from which you can be identified. This includes:

- a. *Contact details* – including but not limited to, your home address, email address and phone numbers;
- b. *Recruitment information* – including but not limited to, your CV/resume, employment history, educational history, professional qualifications, interview notes, selection and verification data and correspondence with RBC or its recruiters with regard to job applications (including references) and any information you provide during an interview;
- c. *Browser data* – data collected through the RBC Careers site as noted through the cookie banner upon collection. This includes information associated with your browser behavior as it pertains to your employment application; and
- d. *Sensitive personal information* – for example, diversity and inclusion-related data which is optional and voluntarily provided by you, as well as health information if disclosed as part of the workplace accommodation request process, and information necessary to perform appropriate background checks, including information about criminal convictions and offences.

## 5. HOW DO WE OBTAIN YOUR PERSONAL INFORMATION?

Depending on the role we collect personal information about candidates from the following sources as appropriate, but not limited to:

- a. You, the candidate;
- b. Recruitment agency;
- c. Background check provider(s);
- d. Credit reference agency;
- e. Your selected references; and
- f. Other applicable external sources, including but not limited to social media and career platforms.

## 6. HOW DO WE USE YOUR PERSONAL INFORMATION?

We will use the personal information we collect about you to:

- a. Assess your skills, qualifications, and suitability for the role;
- b. Carry out background and reference checks, as well as credit checks where applicable;
- c. Communicate with you about the recruitment process;
- d. Keep records related to our hiring processes;
- e. Comply with legal or regulatory requirements; and
- f. For other employment-related, and business development purposes where RBC has a legitimate interest. In instances of legitimate interest, RBC conducts the appropriate assessments to ensure that the legitimate interest of RBC does not outweigh your individual rights and interests.

Upon receiving your application, we will process your personal information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us as part of the interview process to decide whether to offer you the role. If we decide to offer you the role, we will carry out a background check, including a criminal record check and credit check if applicable, before confirming your appointment, and may review and contact your provided references.

As part of the application process, we may leverage automated decision-making technology to support the assessment of your skills, interview responses, and qualifications as they pertain to your candidacy.

### *If you fail to provide personal information*

If you fail to provide information when requested, which is necessary for us to process your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### *Sensitive Personal information*

We will use information, including personal and health information disclosed to us to help determine whether we need to provide appropriate accommodations during the recruitment process, for example whether accommodations need to be made during a test or interview.

### *Information about criminal convictions*

If we decide to offer you a role it may be necessary to collect information about your criminal convictions' history. In certain instances, we are entitled to carry out criminal records checks by

law, in order to confirm and validate that there is nothing in your criminal convictions history which makes you unsuitable for the role. We have in place appropriate processes and safeguards which we are required by law to maintain when processing such data.

## **7. ON WHAT LEGAL BASIS DO WE PROCESS PERSONAL INFORMATION?**

We process your personal information on the following basis:

- a. In order to process your application for employment, enter into an employment or other engagement agreement with you and carry out the obligations of that agreement;
- b. In order to comply with our legal obligations and for the establishment, exercise or defense of legal claims or proceedings;
- c. For reasons of substantial public interest;
- d. For our legitimate business interests as described in Section 6 above;
- e. Where the processing of personal information is required for health and safety purposes, in order to protect your vital interests; and
- f. Where we have obtained your consent to specific processing of your personal information, on the basis of that consent. In those circumstances, you may withdraw this consent at any time.

## **8. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION FOR THIS PURPOSE?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will keep your personal information for the period required by law, and in accordance with our enterprise retention requirements. Otherwise, we keep your personal information for the period necessary to fulfil the purposes outlined in Section 6 above. After this period, we will securely destroy your personal information in accordance with our retention policy and standards.

If we wish to retain your personal information on file on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will ask you separately, seeking your consent to retain your personal information for a fixed period on that basis.

## **9. WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?**

### **9.1 Access to your personal information within RBC**

Due to the global nature of our operations, RBC needs to be able to move personal information across our organisation. We may share your personal information with parties who have a legitimate and justifiable reason to view such data only, including:

- a. Members of the RBC group of companies; and
- b. Personnel and other departments throughout RBC, including, but not limited to Human Resources, and other Functional partners within RBC.

### **9.2 Access to your personal information by third parties**

We will only share your personal information with third parties where required by law or for the purposes of processing your application (for example background check providers, credit agencies, etc.), or those service providers with which RBC has a defined contractual relationship.

When a third party processes your personal information solely following RBC's instructions, it acts as a service provider to RBC, or a “data processor” under the GDPR and UK GDPR. We enter into an agreement with such third-party concerning the processing of personal information which imposes obligations on the processor to safeguard your personal information and to use it only for the purposes of processing outlined in the contractual agreement.

## 10. HOW IS YOUR PERSONAL INFORMATION SECURED?

RBC has taken adequate safeguards to ensure the confidentiality and security of your personal information. RBC has implemented appropriate technical, physical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited, to unnecessary collection) or further processing.

Your personal information may be transmitted through, stored or processed in other jurisdictions which may be outside of the country from which you are applying, and may also be subject to the laws of those jurisdictions, whether or not those jurisdictions have equivalent or adequate data protection legislation.

We will implement appropriate measures to ensure that your personal information remains protected and secure when it is transferred outside of your home country, in accordance with applicable data protection and privacy laws. This includes the implementation of relevant Standard Contractual Clauses as necessary.

For further information, please contact [RBCCareers@rbc.com](mailto:RBCCareers@rbc.com) or [DPO@rbc.com](mailto:DPO@rbc.com) (Europe, UK, Channel Islands).

## 11. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

Under certain circumstances, depending on your region and governing data protection or privacy law, you have the right to:

- a. Request access to your personal information (commonly known as a "data subject access request" or "access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- b. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no legal, contractual, or business requirement for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- d. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- e. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- f. Request the transfer of your personal information to another party.
- g. Request not to be subject to a decision based solely on automated processing, including profiling, which produces significant effects impacting yourself.
- h. Request confirmation of which personal information was used to render the automated decision, and request confirmation of the reasons and principal factors and parameters that led to the decision.

As part of the aforementioned rights that you are accorded, we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who does not have the right to receive it.

You can request access, correction, restriction, portability or removal of the data that RBC processes about you at any time by sending a request to [RBCCareers@rbc.com](mailto:RBCCareers@rbc.com) or to [DPO@RBC.com](mailto:DPO@RBC.com) (Europe, UK Channel Islands).

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

*Right to withdraw consent*

In applying for this role, where you have provided us consent to process your personal information for the purposes of the recruitment exercise, you have the right to withdraw your consent at any time. To withdraw your consent, please contact [RBCCareers@rbc.com](mailto:RBCCareers@rbc.com) or [dpo@rbc.com](mailto:dpo@rbc.com) (Europe, UK, Channel Islands). Once we have received notification that you have withdrawn your consent, we will no longer process your application and subject to our retention policy, we will securely dispose of your personal information. Please also note that you can withdraw your application any time.

We have appointed a data protection officer (DPO) and regional Privacy Officers to oversee compliance with this privacy statement. If you have any questions about this Privacy Statement or how we handle your personal information, please contact the [RBCCareers@rbc.com](mailto:RBCCareers@rbc.com) or [DPO@RBC.com](mailto:DPO@RBC.com) (Europe, UK Channel Islands). You have the right to make a complaint at any time to your local supervisory authority for data protection issues.

## **DOCUMENT HISTORY AND DESCRIPTION OF MOST RECENT CHANGES**

### **May 24<sup>th</sup>, 2018**

First publication of the Job Applicant Privacy Notice.

### **June 2018 revision:**

This revision does not introduce material changes to the essence of this Job Applicant Privacy Notice. The following revisions were made:

- Update of the list of RBC legal entities in Appendix 1

### **April 2019 revision:**

This revision does not introduce material changes to the essence of this Job Applicant Privacy Notice. The following revisions were made:

- Update of the list of Data Protection Authorities in Appendix 2

### **July 2019 revision:**

This revision does not introduce material changes to the essence of this Employee Privacy Notice. The following revisions were made:

- Update of the list of RBC legal entities with a new legal entity in the Netherlands in Appendix 1, and
- Update of the Data Protection Authorities list to include the Dutch authority details in Appendix 2

### **October 2023 revision:**

This revision introduces the following changes:

- Updates to Section 4 to include additional personal information
- Updates to Section 5 to include additional sources of personal information
- Updates to Section 6 to include 6 f)
- Updates to Section 10
- Updates to Section 11 to include additional RBC contacts for applicant outreach
- Removal of Appendix 1
- Removal of Appendix 2