

## PATHWARD APPLICANT PRIVACY NOTICE

This Applicant Privacy Notice (“**Applicant Privacy Notice**”) explains how Pathward Financial, Inc. and Pathward, National Association (collectively, “**Pathward**” “**we**” or “**us**”), handle Personal Information (i.e., Personal Data or other similar terms as defined by applicable law) in connection with recruitment and pre-employment activities of California applicants (including, temporary employees, interns, and individuals being considered for rendering contracted services to Pathward in an individual capacity (“independent contractors”)). **Please read this Applicant Privacy Notice carefully before submitting Personal Information to Pathward as part of the applicant process.**

We also have a separate notice, our Employee Data Protection Notice (the “Personnel Notice”), governing our data practices for employees and associated independent contractors (collectively, “Personnel”). Information collected under this Applicant Privacy Notice will be subject to the Personnel Notice if and when an individual becomes a Pathward employee or independent contractor. This Notice does not form part of any contract of employment or engagement, does not confer any employment status or contractual right on any Personnel, and does not place any contractual obligation on us.

This Notice does not apply to the actions of any company or entity that we do not control and to individuals who we do not directly employ or manage.

### **California Consumer Notice of Collection**

This Notice of Collection is provided to all California applicants subject to this Applicant Privacy Notice. Please reference specific topics in this Applicant Privacy Notice below:

[What Categories of Personal Information Do We Collect About You?](#)

[Sources of Personal Information?](#)

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### **WHAT CATEGORIES OF PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?**

As part of our recruitment and pre-employment activities, we collect the following professional and educational Personal Information about applicants:

- **Contact Information/Identifiers:** name, gender, age, email address, mailing address, telephone number, social media profiles where voluntarily provided and permitted by law, and in certain instances, residency and work permit status.
- **Professional and Employment-Related Information:** professional qualifications, prior employment history, education history, additional information included in resumes or curriculum vitae, cover letters, writing samples, transcripts, certifications, and other materials you submit during the application or regarding references you provide.
- **Education information,** such as information about your degrees and training, transcripts, and

academic achievements that you disclose in your application;

- **Information about your relationship with Pathward companies**, including any current or prior work experience, and any association you may have with any current or former Pathward employees;
- **Interview Information**: notes collected by interviewers or other professional assessment information.
- **Pre-employment Screening**: if we offer you a job, we may collect additional background information such as credit history and eligibility information (as permitted by law).
- **Internet or other electronic network activity information**: device identifier, internet protocol (IP) address, or similar unique identifiers (to the extent you apply or otherwise interact with Pathward careers portal).
- **Sensitive Personal Information (where permitted and in accordance with applicable law)**: of the information listed above, including but not limited to your work permit or visa application information, racial or ethnic origin, gender, disability status, veteran status, or other demographic information, sexual orientation, and/or criminal history may also generally qualify as Personal Information.
- **Audio, visual, or similar information** such as photos and information gathered via cameras and CCTV; and
- **Other information** you may choose to submit to us in connection with your application.

In many instances, the provision of the Sensitive Personal Information listed above is voluntary. We will let you know when that is the case, and if you decide not to share these with us, not doing so will not impact your application. More broadly, the provision of your Personal Information is both a contractual and statutory obligation and is voluntary, but in certain instances, we will not be able to process your application for employment without the requested Personal Information.

Through our career websites, you may choose to provide us with access to certain information maintained by third-party websites or services, such as by asking us to import information contained in your employment network or social network profiles (e.g., LinkedIn). The information we may receive varies by website or service and is controlled by the third-party provider and your privacy settings. By authorizing our access to this information, you agree that we may collect, store, and use this information in accordance with these terms. We are not responsible for the privacy or security practices of any non-Pathward-operated websites or services, including those that may be linked through our career websites, and we encourage you to review the privacy policies and other terms of use applicable thereto.

If you give us the Personal Information of another person, such as, your professional references, we assume you have their permission to share their information with us.

When you visit and use our career websites, we may automatically collect or log certain information about your visits and usage, using technologies such as cookies, server logs, and web beacons. This information may include your internet protocol (IP) address, technical information about browsers and devices used to access the career websites, and information about crashes or other technical issues. This information is generally aggregated to analyze and improve the quality and reliability of the career websites; it is not used to make employment-related decisions. At this time, the career websites are not designed to respond to “Do Not Track” signals, or similar mechanisms, from browsers.

#### **SOURCES OF PERSONAL INFORMATION?**

We collect your Personal Information in the following ways, pursuant to applicable law:

**Directly From You**, when you submit an application for employment on our Pathward website; share or use your social media profile on your employment application; sign up with us to receive open job postings; share your resume with us, either via the Pathward careers portal or through other means; and/or participate

in interviews or other recruitment activities.

**Other Sources**, including employment or recruitment agencies, background check providers, references, or other publicly available sources.

### **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We use your Personal Information and Sensitive Personal Information for the following business purposes (“Processing Purposes”) associated with the administration of your application and our general business operations:

- Creating and managing your job applications.
- To review and consider your application for the position(s) for which you apply, or other potential current or future Pathward positions.
- To communicate with you regarding the application and recruitment process or send you information about other Pathward positions that may be of interest to you.
- For pre-employment screening if we decide to offer you employment.
- To consider you for opportunities we have now, or future ones, in any of the Pathward companies.
- To administer recruitment and staffing activities.
- To manage and improve our recruitment processes and our business operations related to the recruitment process, including through analysis of our applicant pool and our hiring practices or trends.
- To comply with applicable laws, legal obligations and/or protect our legal interests.
- Preventing, detecting, and responding to misuse of the career websites, fraud, intellectual property infringement, or other violations of law or applicable Pathward policies.
- We use Sensitive Personal Information to evaluate Pathward’s progress in achieving its diversity hiring goals, to ensure equal opportunity monitoring and reporting, to meet legal obligations, including providing workforce accommodations and for disability and workplace safety tracking administration.

With regard to Sensitive Personal Information, we only use your Sensitive Personal Information to provide you with the requested services and to administer your account.

We may also use the information as necessary or appropriate to protect, enforce, or defend our legal rights, the privacy or safety of our applicants and employees, other users of the career websites, and other individuals and entities, or to comply with, or enforce, applicable legal requirements including performing any legally required reporting, and responding to legal process.

If you are offered and accept employment with Pathward, the information collected during the application and recruitment process may become part of your employment record. Employees and former employees will also receive a separate privacy notice governing processing of personal information during the employment relationship.

### **TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

Pathward may disclose all categories of Personal Information listed above to the following parties for the Processing Purposes identified above:

- **Within Pathward.** We may disclose information to Pathward affiliates and subsidiaries who have a need to know the information for the purposes described above in the course of our normal business operations and as needed to address our corporate structure.
- **Service Providers.** As part of normal business operations, Pathward may disclose Personal Information to third-party service providers, including in connection with recruiting and human

resources support, information technology and security support, background screening providers, and other normal business operations support.

- **Government Entities or Regulators.** Pathward may disclose Personal Information to governmental agencies and regulators (e.g., tax authorities, social security administration), external professional advisors (e.g., lawyers, accountants, insurers, bankers, and auditors), courts and other tribunals, and government authorities, to the extent required or permitted by applicable law.
- **As Necessary for Legal Obligations.** Pathward may disclose Personal Information to other third parties to comply with legal obligations, to protect the rights and property of Pathward, our customers and the public, and to detect and respond to suspected or illegal activity and threats to the health and safety of any person or of our systems or services.
- **Business Transactions.** In the event of mergers, reorganizations or similar corporate restructuring activities, we may disclose information with that company. In some instances, this may include your Personal Information.
- **Other Parties.** If you direct us to, or consent to such disclosures, we may also disclose to third parties or categories of third parties not listed above.

We may also disclose aggregated or de-identified information, which cannot reasonably be used to identify you. Pathward processes, maintains, and uses this information only in a de-identified fashion and will not attempt to re-identify such information except as permitted by law.

#### **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

Pathward will retain your Personal Information, including Sensitive Personal Information, only for as long as it is necessary to fulfill the above-mentioned Processing Purposes, or as required to comply with applicable legal requirements. To determine that period, we take into account a number of factors, including our legal and regulatory obligations (such as financial reporting obligations and equal opportunity or anti-discrimination reporting obligations) and whether we may need to retain personal information to resolve disputes, make and defend legal claims, conduct audits, pursue legitimate business purposes and/or enforce our agreements. Once the data retention period has run, Pathward will purge your personal information within a reasonable timeframe.

#### **INTERNATIONAL DATA TRANSFERS**

Our servers are located in the US. If you are located outside of the US, please be aware that any information provided to us, including Personal Information, will be transferred from your country of origin to the US. To the extent permitted under applicable law, your decision to provide such data to us, or allow us to collect such data through our website, constitutes your consent to this data transfer.

#### **HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?**

We maintain appropriate administrative, technical, physical, and organizational measures to protect against unauthorized or unlawful processing of Personal Information and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Information. However, no method of transmission over the internet, or method of electronic storage is 100% secure. Therefore, while we make reasonable efforts designed to protect this information, we cannot guarantee its absolute security.

#### **ADDITIONAL DISCLOSURES FOR CALIFORNIA RESIDENTS**

California law requires us to explain certain information using definitions and categories set out under California law. If you reside in California, this section applies to you.

In the preceding twelve months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

<i>Category of Personal Information</i>	<i>Categories of Recipients</i>
Identifiers, such as your name and email address	Pathward affiliates, recruitment service providers, background check providers, government authorities, regulators, and professional advisors
Characteristics of protected classifications under California or U.S. federal law, such as your gender, race, and age	Recruitment service providers, background check providers, government authorities, regulators, and professional advisors
Professional and employment-related information, such as your resume and application information	Recruitment service providers and background check providers
Education information, such as the academic achievements you disclose in your application	Recruitment service providers and background check providers
Audio, visual, or similar information such as video data from CCTV	Recruitment service providers, fraud detection and security service providers
Sensitive personal information, such as your race or ethnicity	Recruitment service providers, background check providers, government authorities, and regulators

### *California Privacy Rights*

California law provides applicants who are California residents with certain rights with respect to their data, including the following:

- *Right to Access:* You may ask us to confirm whether we are processing your personal information and, if so, to provide you with a copy of the personal information we hold about you (along with certain other details).
- *Right to Correction:* If the personal information we hold about you is inaccurate or incomplete, you are entitled to ask for correction or completion.
- *Right to Deletion:* You may ask us to delete or remove your personal information in some circumstances—for example, if we no longer need it.

Applicants residing in California may exercise any of these privacy rights by contacting us at [privacy@pathward.com](mailto:privacy@pathward.com) or calling our toll-free number: (833) 898-0023. We may verify your request by asking you to provide certain information. You may also designate an authorized agent to exercise privacy rights on your behalf by providing the authorized agent signed permission to submit the request on your behalf. If an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your personal information. If you are an authorized agent seeking to make a rights request, please contact us at [privacy@pathward.com](mailto:privacy@pathward.com).

Any request to exercise your rights will be assessed by Pathward on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request because of a relevant legal exemption provided for under applicable law. We will not discriminate or retaliate against you for exercising your privacy rights. If you choose not to disclose certain personal information, this may limit our ability to perform certain activities or to proceed with the recruitment process.

### *Sensitive Personal Information*

We do not use or disclose your sensitive personal information (which includes information such as your race or national origin) for purposes other than those expressly permitted under California law, such as to accommodate a disability or illness, comply with legal obligations and internal policies related to diversity and anti-discrimination, and protect the health and safety of applicants and employees.

### *“Sales” or “Sharing” of Personal Information*

We do not “sell” or “share” your personal information as those terms are defined under California law.

### **CONTACT INFORMATION**

Any questions or concerns regarding the handling of Personal Information by Pathward, or related to revocation of consent to collect, process, transfer, or disclose your Personal Information should be directed by email to [privacy@pathward.com](mailto:privacy@pathward.com) or by phone at (833) 898-0023.

Alternatively, letters may be sent to the following address:

Pathward Financial, Inc.  
Attn: Privacy Department  
5501 S. Broadband Lane  
Sioux Falls, South Dakota 57108

### **HOW DO WE UPDATE THIS APPLICANT PRIVACY NOTICE?**

We may update this Applicant Privacy Notice to reflect changes in the way we process Personal Information. We will notify you about such changes in the way we use your Personal Information in compliance with applicable law.

This Applicant Privacy Notice includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

**Effective Date.** January 1, 2023

**Last Updated Date.** October 29, 2024