

PATHWARD
Applicant Privacy Notice

This Applicant Privacy Notice (“Applicant Privacy Notice”) explains how Pathward Financial, Inc. and Pathward, National Association (collectively, “Pathward”), 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.**

California Consumer Notice of Collection

This Notice of Collection is provided to all California applicants subject to this Applicant Privacy Notice. You can access specific topics in this Applicant Privacy Notice by clicking on the relevant links below:

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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, date of birth, email address, mailing address, telephone number, social media profiles, and in certain instances, identification documents, residency and work permit status, social security number (which may also be considered Sensitive Personal Information), account username and password, or other taxpayer/government identification number.
- **Professional and Employment-Related Information:** professional qualifications, prior employment history, education history, additional information included in curriculum vitae, or references.
- **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).
- **Device Information and Other Unique Identifiers:** 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, social security number, account username and password, driver’s license number, racial or ethnic origin, trade union membership, health and medical information

(including where required, drug screening results), sexual orientation, and/or criminal history may also generally qualify as Personal Information.

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.

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.

SOURCES OF PERSONAL INFORMATION?

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

Directly From You, when you create an account and profile in the Pathward careers portal; share or use your social media profile to access the Pathward career portal; 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:

- To review and consider your application.
- 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.
- To comply with applicable laws, legal obligations and/or protect our legal interests.
- 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.

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 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, 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 advisors (e.g., lawyers, accountants, and auditors), courts and other tribunals, and government authorities, to the extent required or permitted by applicable law.
- **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.

WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION?

You may have certain rights regarding your Personal Information. The rights available to you depend on our reason for processing your Personal Information and the requirements of applicable law (i.e., your rights will vary depending on whether you are located in, for example, California). Specifically, you may have the following rights:

- (i) **Access:** You have the right to request access to the Personal Information we hold about you, along with other information such as the purposes of the processing, the recipients or categories of recipients to whom the Personal Information has been or will be disclosed, the sources of the Personal Information, retention, and transfers of Personal Information.
- (ii) **Correction:** You have the right to request correction/rectification of inaccurate Personal Information we have about you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Information completed, including by means of providing a supplementary statement.
- (iii) **Deletion:** You have the right to request that we delete your Personal Information.
- (iv) **Data Portability:** Under certain circumstances, you have the right to receive the Personal Information about you that you have provided to us, in a structured, commonly used and machine-readable format.
- (v) **Opt out of the sale or sharing of Personal Information:** We do not currently, nor have we in the preceding 12 months, sold or shared (in this context, share means use of your Personal Information for cross-contextual behavioral advertising) your Personal Information given to us in your capacity as an applicant.
- (vi) **Right of Non-Discrimination/Retaliation:** We do not discriminate against individuals who exercise any of their rights described in this Applicant Privacy Notice, nor do we retaliate against individuals who exercise these rights.
- (vii) **Right to Opt out of certain uses and disclosures of Sensitive Personal Information:** You have the right to request the restriction of processing of your Sensitive Personal Information. At the

current time, however, we do not use or disclose Sensitive Personal Information for purposes other than those expressed in this Applicant Privacy Notice or as otherwise permitted by applicable law, and these uses cannot be limited under California law.

Please note that many of the above rights are subject to exceptions and limitations. Your rights and our responses will vary based on the circumstances of the request. If you choose to assert any of these rights under applicable law, we will respond within the time period prescribed by such law.

If you are located in the state of California, a person authorized to act on your behalf may make a verifiable request related to your Personal Information. If you designate an authorized person to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf.

In any circumstances, your request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative of that person; and (ii) describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

To exercise your rights, please contact us as at privacy@pathward.com or call us at our toll-free number: (833) 898-0023.

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. Even when the recruitment and pre-employment screening activities are complete, we may need to keep it longer because of a legal action, or an investigation involving Pathward.

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 technical 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.

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 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. January 1, 2023